3.20 Other CEQA Considerations

The California Environmental Quality Act (CEQA) Guidelines, Section 15126, identifies the subjects that shall be discussed in an Environmental Impact Report (EIR) including effects determined not to be significant, significant unavoidable impacts, and irreversible environmental changes. These subjects are discussed in the following sections.

3.20.1 Programmatic Evaluation of Pre-cast Concrete Facilities

As described in Chapter 2, Project Description, Alternatives 1, 3, 4, and 5 would require construction of a pre-cast concrete facility to fabricate concrete structures and components for these alternatives. For Alternatives 1 and 3, this facility is anticipated to be located outside the Project Study Area, potentially in the Antelope Valley or Riverside County while Alternatives 4 and 5 plan to construct this facility on the heavy rail transit (HRT) maintenance and storage facility (MSF) site prior to construction of the MSF itself. While Alternative 6 would require pre-cast elements, it is anticipated that an existing facility could be used and so construction of a new facility would not be required. Pre-cast concrete facilities are complex operations involving material handling, concrete curing, and the use of heavy diesel equipment, aggregates, curing chemicals, water, and large trucks. Because these facilities have not yet been designed and their specific locations, layouts, and operational details remain under development, the following analysis is conducted at a programmatic level. Depending on site selection, facility design, and the potential for new or more significant environmental impacts, additional CEQA review may be required before construction or operation of these facilities.

3.20.1.1 Potential Environmental Effects

Air Quality: The construction and operation of a precast concrete facility would generate fugitive dust and diesel particulate emissions from material handling, truck traffic, and equipment operation. These emissions would be subject to permitting requirements from the South Coast Air Quality Management District (SCAQMD) and local air districts to ensure compliance with air quality regulations. Additionally, Mitigation Measures (MM) AQ-2 and MM AQ-3 would compel the construction contractor to implement best management practices (BMPs) for dust control, such as water application, wind barriers, and operational limits, to minimize impacts on surrounding land uses. Based on these regulatory requirements, air quality impacts of the precast concrete facilities are anticipated to be less than significant; however, the final determination would depend on site-specific factors, facility design, and permitting conditions.

Hazardous Waste: The transport, use, storage and disposal of hazardous materials, during both construction and operation of the precast facility would comply with all applicable regulation and requirements in accordance with Project Measure (PM) HAZ-1, PM HAZ-2, PM HAZ-4, and PM HAZ-5 described in Section 3.8, Hazards and Hazardous Materials. In addition, the use of chemical curing agents will require a hazardous waste management plan from the Department of Toxic Substances Control (DTSC) and the local fire department. Compliance with these regulatory requirements is expected to ensure that hazardous materials impacts remain less than significant; however, the level of impact would ultimately depend on site-specific conditions, facility design, and operational details.

Land Use: While typically located in industrial or mining zones, the facility will likely require site-specific conditional use approvals from the local jurisdiction. This includes conditions for material storage, noise/vibration mitigation, operating hours, truck delivery times as well as screening storage piles and gantries from sensitive areas. The conditional use approval process, which may include public hearings and detailed review by the local agency, is expected to ensure land use compatibility and minimize

conflicts. While impacts on land use are anticipated to be less than significant, final determinations will depend on site selection and the conditions imposed by the permitting jurisdiction.

Mineral Resources: Concrete and aggregate materials that meet the quality standards required by the individual design specifications of the project alternatives would be sourced and purchased from various vendors throughout the United States. Because no direct extraction or on-site mining would occur, and the materials would be obtained through existing suppliers, impacts to mineral resources are expected to be less than significant.

Noise and Vibration: Construction and operations at the facility, including vibratory curing equipment, heavy machinery, and truck traffic, could generate noise and vibration impacts on nearby land uses. Consistent with standard practice, the facility would likely require buffer zones, setbacks from sensitive receptors, and enclosures or vibration-dampening measures to minimize off-site disturbances. Compliance with local noise ordinances and operational restrictions, such as limits on nighttime activities, would also help control potential impacts. While these measures are expected to be implemented and to reduce noise and vibration impacts to a less than significant level, the actual impact would depend on facility siting, equipment selection, and site-specific mitigation measures imposed by the local jurisdiction.

Transportation: Transporting oversized loads of concrete forms with significant weight would require specialized hauling and permitting. Caltrans permits would be required for transport along state highways, and approvals from the local jurisdiction would be required for transport on local streets and roadways. As is standard practice, the facility's construction and operational plan would likely consider traffic management strategies, designated haul routes, and potential time restrictions to minimize disruption to local traffic patterns. With adherence to these permitting requirements and BMPs, transportation impacts are expected to remain less than significant; however, the final determination would depend on facility location, haul route conditions, and the volume of truck trips required.

Utilities and Services: Substantial energy consumption and water use will require specific agreements with local providers and water districts. Energy consumption at the facility would be regulated under California's Title 24 Building Energy Efficiency Standards, and water use would be subject to California Water Code regulations and require coordination with the local water district; if groundwater is used, additional review under the Sustainable Groundwater Management Act (SGMA) may be required. Wastewater and stormwater disposal would be subject to local industrial wastewater discharge regulations and may require permits from the Regional Water Quality Control Board or on-site treatment if municipal disposal is unavailable. Compliance with these regulatory requirements and permitting processes would likely ensure that impacts on utilities and services are less than significant; however, the final determination would depend on site-specific conditions, facility design, and local infrastructure capacity.

Water Quality: Water usage, particularly water containing curing chemicals, necessitates stormwater runoff management plans approvals and compliance with National Pollutant Discharge Elimination System (NPDES) permits. Industrial waste disposal permits will likely be required for wastewater generated at the facility. The NPDES permit would require monitoring and regulation of stormwater discharges. In addition, industrial waste disposal permits would likely be required for wastewater generated by facility operations. Proper containment, treatment, and disposal in accordance with state and local water quality standards would be required. With adherence to these regulatory requirements and best management practices, water quality impacts are anticipated to be less than significant;

however, the final determination would depend on site-specific conditions, facility design, and permitting requirements imposed by regulatory agencies.

Cumulative Impacts: The construction and operation of the precast concrete facility, as a supporting component of Alternatives 1, 3, 4, and 5, would contribute to cumulative impacts but would not be cumulatively considerable in most resource areas. Both the facility and the transit infrastructure would be subject to strict air quality, hazardous materials, noise, vibration, and transportation regulations, with permitting and mitigation requirements that would ensure their combined effects remain within acceptable levels.

However, construction of Alternatives 1, 3, 4, and 5 would result in a significant and unavoidable cumulative air quality impact in the South Coast Air Basin, meaning emissions from the precast facility could incrementally contribute to this impact. It is possible that the facility for Alternatives 1 and 3 would be located in the Antelope Valley, within the Mojave Desert Air Basin, where it would be subject to different regulatory oversight by the Antelope Valley Air Quality Management District (AVAQMD). If located in the Mojave Desert Air Basin, the facility's emissions would not directly contribute to cumulative air quality impacts in the South Coast Air Basin but could result in cumulative impacts within the Mojave Desert Air Basin, depending on background pollution levels and regional air quality attainment status.

Cumulatively considerable impacts are not anticipated In other resource areas. The facility's energy and water demands would be coordinated with local utilities, minimizing strain on regional resources. Stormwater and wastewater discharges would be regulated under NPDES permits. Transportation impacts from material hauling would be managed through permitting and traffic control measures. Given these regulatory requirements and BMPs, the incremental contribution of the precast facility to cumulative impacts would not be cumulatively considerable, except with respect to air quality, where it would contribute to the significant and unavoidable impacts associated with the respective alternatives.

Programmatic Impact Determination: It is expected that compliance with permits, land use approval conditions, and local operational restrictions would result in less than significant environmental impacts at the programmatic level for this facility. This conclusion is incorporated by reference into the construction impact assessment for Alternatives 1, 3, 4, and 5, and would not exacerbate or increase the construction phase impacts for these alternatives identified throughout this document.

3.20.2 Effects Determined Not to be Significant

This section discusses the environmental topics for which the Sepulveda Transit Corridor Project (Project) alternatives (including the maintenance and storage facilities [MSF]) would have no potential to cause significant impacts. It has been determined that there is no potential for the Sepulveda Transit Corridor Project to result in significant impacts to the environment in the following environmental topics: agriculture and forestry resources and mineral resources. These topics are not evaluated in the previous sections of this chapter; however, these topics are briefly addressed in the following subsections pursuant to CEQA Guidelines Section 15128.

3.20.2.1 Agriculture and Forestry Resources

Additional information regarding the agriculture and forestry resources within the Project Study Area is provided in the *Sepulveda Transit Corridor Project Land Use and Development Technical Report* (Metro, 2025a).

For the purposes of this EIR, impacts are considered significant if the Project would:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.
- Conflict with existing zoning for agricultural use, or a Williamson Act contract.[1]
- 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 [PRC] Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).
- Result in the loss of forest land or conversion of forest land to non-forest land use.
- Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

The Project Study Area is located in densely developed areas on what the California Department of Conservation (DOC) Important Farmland map designates as Urban and Built-Up Land (DOC, 2022). Areas designated as Urban and Built-Up Land are not considered Important Farmland (i.e., Prime Farmland, Unique Farmland, or Farmland of Statewide Importance) under CEQA's California PRC Sections 21060.1 and 21095 and CEQA Guidelines Appendix G. The DOC does not identify any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within the Study Area. There are no parcels designated as agricultural or under a Williamson Act contract within the vicinity of any of the project alternatives. Alternatives 1, 3, 4, 5, and 6 would not involve changes that could result in conversion of farmland to non-agricultural uses or conflict with agricultural uses because there are no agricultural uses or farmland in the Project Study Area. Therefore, the Project would not involve conversion of Prime Farmland, Unique Farmland, or Farmlands of Statewide Importance to nonagricultural use, and no impact would occur during operation or construction.

Similarly, there are no areas of forest land, as defined in PRC Section 12220(g), or timberland, as defined in PRC Section 4526 within the Study Area.[2] According to the United States (U.S.) Department of Agriculture Forest Services, the closest designated forest land is the Angeles National Forest located approximately 12.5 miles east of the Van Nuys Metrolink/Amtrak Station, which is the northern terminus of all of the project alternatives. As such, Alternatives 1, 3, 4, 5, and 6 would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned as Timberland Production, and no impact would occur during operation or construction of any one of these alternatives.

3.20.2.2 Mineral Resources

Additional information regarding the mineral resources within the Project Study Area is provided in the *Sepulveda Transit Corridor Project Geotechnical, Subsurface, Seismic, and Paleontological Technical Report* (Metro, 2025b).

[1] The Williamson Act creates an arrangement whereby private landowners voluntarily restrict their land to agricultural and compatible open space uses under a rolling 10-year contract. In return, parcels are assessed for property tax purposes at a rate consistent with their actual use, rather than their potential market value.

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

For the purposes of this EIR, mineral resources impacts are considered significant if the Project would:

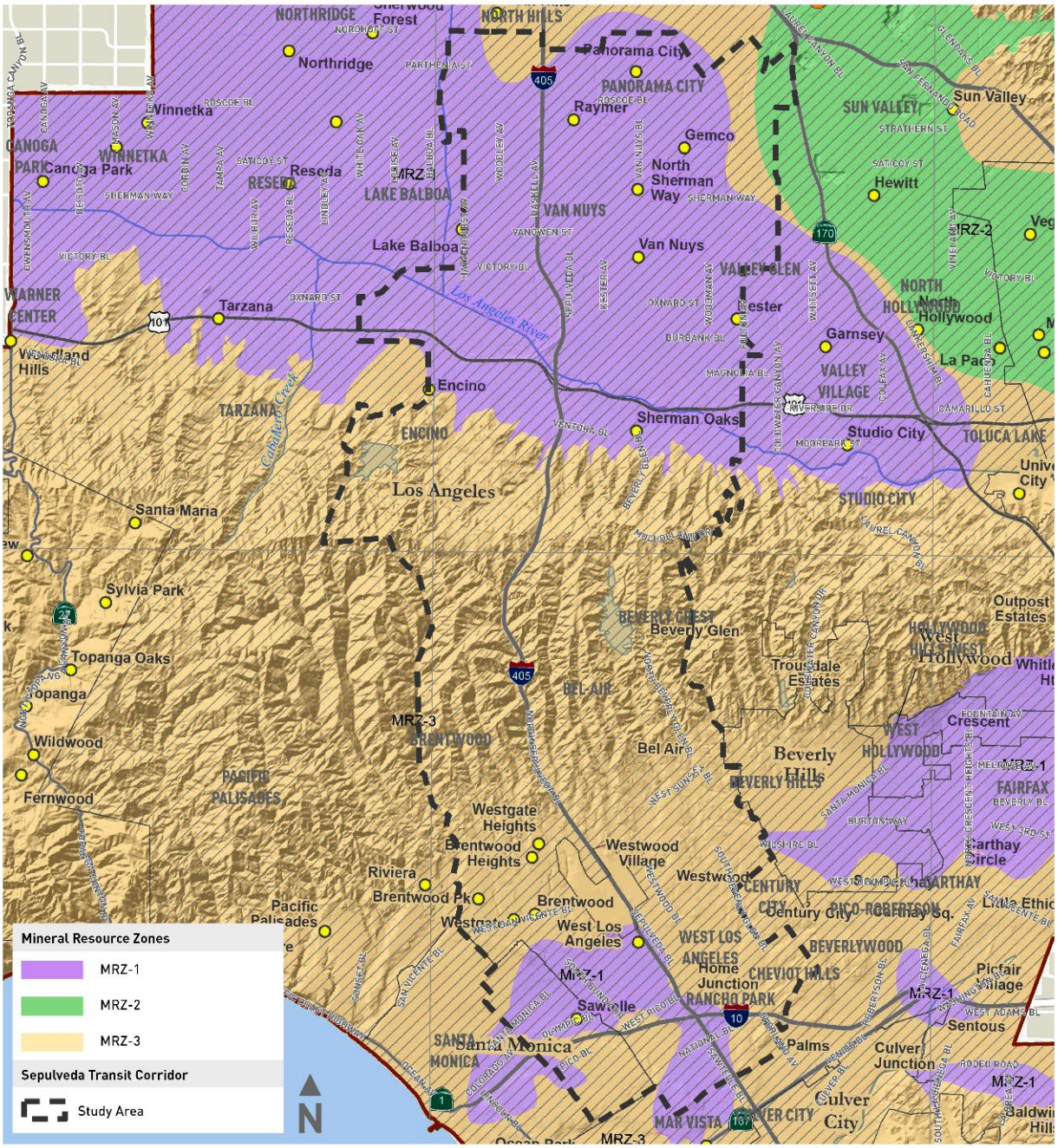
- Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.
- Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

Mineral resource areas are identified according to the Surface Mining and Reclamation Act of 1975 and the following criteria for Mineral Resource Zones (MRZ), Scientific Resource Zones (SZ), and Identified Resource Areas. The MRZ and SZ categories used by the state geologist in classifying the state's lands are based on land classification information provided by the state geologist to the State Division of Mines and Geology Board for the following areas:

- **MRZ-1:** Adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence. This zone shall be applied where well-developed lines of reasoning, based on economic geologic principles and adequate data, demonstrate that the likelihood for occurrence of significant mineral deposits is nil or slight.
- **MRZ-2:** Adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists. This zone shall be applied to known mineral deposits or where well-developed lines of reasoning, based on economic geologic principles and adequate data, demonstrate that the likelihood for occurrence of significant mineral deposits is high.
- **MRZ-3:** Containing deposits whose significance cannot be evaluated from available data.
- **MRZ-4:** Available information is inadequate for assignment to any other MRZ zone.
- **SZ Areas:** Containing unique or rare occurrences of rocks, minerals, or fossils that are of outstanding scientific significance shall be classified in this zone.

No mining operations are currently present within the Project Study Area. The California DOC, Division of Mines and Geology, classifies areas of regional significance as MRZ -2 (CGS, 2021). None of the project alternatives are located within an MRZ-2 designated area. Instead, the Project Study Area includes zones designated as MRZ-1 and MRZ-3 (Figure 3.20-1). Specifically, portions of the project alternatives in the San Fernando Valley (Valley) and Westside of Los Angeles (Westside) would be located within MRZ-1 zones, where significant mineral deposits are unlikely to be present. The sections of the project alternatives passing through the Sepulveda Pass would mostly be located within MRZ-3 zones, which contain deposits whose significance cannot be evaluated based on available data.

Figure 3.20-1. Mineral Resources



Source: CGS, 2021; HTA, 2024

Operation of the project alternatives would not require excavation that may affect mineral resources based on the MRZs identified within the Project Study Area. Constructing Alternatives 3, 4, 5, and 6 would require cut-and-cover excavation for underground stations, and tunnel boring machines (TBM) would be used for tunnel construction. However, none of project alternatives would be located in an area with known mineral deposits. No mining operations are present within any of the excavation or tunneling portions of any of the project alternatives, so constructing the Project would not disrupt

mining operations. Therefore, the Project would have no construction impacts related to the loss of availability of a known mineral resource or a locally important mineral resource recovery site.

3.20.3 Significant and Unavoidable Impacts

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

This environmental impact analysis concludes that no feasible mitigation measures exist to reduce, to less than significant levels, the significant impacts of construction-related pollutant emissions associated with Alternatives 1, 3, 4, 5, and 6; changes to visual character associated with Alternative 4; conflicts with plans preserving open space land associated with Alternatives 1 and 3; destruction of cultural resources associated with Alternatives 1, 3, 4, and 6; noise and vibration generated by construction of Alternatives 1, 3, 4, 5, and 6; and potential paleontological impacts due to tunneling activities associated with Alternatives 3, 4, 5, and 6. The maintenance and storage facilities associated with Alternatives 1, 3, 4, 5, and 6 would result in unresolved conflicts with the LADWP Urban Water Management Plan (LADWP, 2020) and a potential need to relocate or construct new water facilities. The No Project Alternative would result in significant and unavoidable impacts related to conflicts with the SCAQMD Air Quality Management Plan (AQMP) and Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) as the Project is included in these plans. The impacts are discussed in further detail in Section 3.1, Aesthetics, Section 3.2, Air Quality, Section 3.4, Cultural Resources, Section 3.6, Geology, Soils, and Paleontology, Section 3.7, Greenhouse Gas Emissions, Section 3.10, Land Use and Planning, Section 3.11, Noise and Vibration, and Section 3.17, Utilities and Service Systems.

3.20.3.1 No Project Alternative

Impact AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

The Project, identified as project number 1160001 (Sepulveda Pass Transit Corridor Phase 2), is included in the *Connect SoCal, 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy* (2024-2050 RTP/SCS) (SCAG, 2024). Transportation projects identified in a conforming RTP are consistent with the emissions reduction strategies outlined in the applicable regional AQMP. The 2022 AQMP outlines comprehensive control strategies to meet fine particulate matter of diameter less than 2.5 microns ($PM_{2.5}$), ozone (O_3), and lead (Pb) standards, and to maintain carbon monoxide (CO), nitrogen dioxide (NO_2), and particulate matter of diameter less than 10 microns (PM_{10}) standards. Transportation projects identified in a currently conforming RTP are consistent with the transportation sector emissions budgets used in the formulation of the regional AQMP. Under the No Project Alternative, the project alternatives would not be constructed. Because the Project was included in SCAG's RTP and SCAQMD's AQMP, the No Project Alternative would conflict with these planning documents. Therefore, the No Project Alternative would conflict with the 2022 AQMP and would result in a significant and unavoidable impact.

Impact GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

An element of the 2024-2050 RTP/SCS (SCAG, 2024) is a regional greenhouse gas (GHG) emissions inventory and emissions forecast based on the growth projections and control strategies incorporated into its development. SCAG provides estimates of the regional GHG emissions through the RTP/SCS horizon year, accounting for programmed transportation projects, population, employment, and housing growth, and other regional factors. Expansion of public transportation systems spurring mode shift away from passenger vehicles is a fundamental pillar of regional efforts to reduce GHG emissions and meet regional and statewide GHG emissions reduction targets. While the No Project Alternative would provide some transit benefit in the form of rerouting Metro Line 761, not implementing the Project would conflict with these targets, as the Project is in and of itself one of the strategies in the 2024-2050 RTP/SCS (SCAG, 2024) to contribute to achieving the per capita reduction targets; therefore, impacts would be significant and unavoidable.

Impact TRA-1: Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The Project is included in Metro's 2020 *Long Range Transportation Plan* (Metro, 2020a), with funding programmed through Measure M (Metro, 2016), and in SCAG's *Connect SoCal,* 2024-2050 RTP/SCS (SCAG, 2024) as the "Sepulveda Pass Transit Corridor (Phase 2)." Under the No Project Alternative, the Project would not be constructed. Therefore, this conflict with an adopted plan is considered a significant and unavoidable impact.

3.20.3.2 Alternative 1

Impact AQ-2: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Alternative 1 construction activities would generate criteria pollutant emissions from off-road equipment; mobile sources, including workers, vendor trucks, and haul trucks traveling to and from construction sites; demolition; soil handling activities; paving; applying architectural coatings; and operating temporary concrete batch plants. As described in Section 3.2, Air Quality, Alternative 1 construction emissions would exceed the SCAQMD regional significance thresholds for nitrogen oxides (NO_X) and CO emissions. Additionally, recognizing that SCAQMD's regional significance thresholds were established to achieve attainment of the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS), which in turn define the maximum amount of an air pollutant that can be present in ambient air without harming public health, Alternative 1's contribution of pollutant emissions may result in appreciable human health impacts on a regional scale. Prolonged exposure to elevated NOx levels can lead to respiratory inflammation and decreased lung function, particularly for vulnerable populations such as children, the elderly, and individuals with pre-existing conditions like asthma or chronic obstructive pulmonary disease. Similarly, elevated CO levels can impair oxygen delivery to vital organs, potentially exacerbating cardiovascular conditions. Mitigation measures (MM) AQ-1, MM AQ-2, and MM AQ-3 would reduce criteria pollutant emissions during construction, but mitigation measures would not reduce Alternative 1 NO_X and CO emissions below SCAQMD significance thresholds; therefore, Alternative 1 construction emissions would result in a cumulatively considerable net increase of criteria pollutants for which the project region is non-attainment under an applicable federal or state ambient air quality standard, and impacts would be significant and unavoidable.

Impact AQ-3: Would the project expose sensitive receptors to substantial pollutant concentrations?

Alternative 1's localized emissions included exhaust emissions from off-road equipment and trucks, and fugitive dust from demolition, earth movement activities, and truck travel. Alternative 1's localized construction emissions would exceed the respirable PM_{10} localized significance threshold (LST) for construction activity in the Valley; therefore, Alternative 1's localized construction emissions would be potentially significant. Although MM AQ-1, MM AQ-2, and MM AQ-3 would reduce criteria pollutant emissions during construction, including localized PM_{10} emissions, mitigation measures would not reduce Alternative 1 PM_{10} emissions below SCAQMD localized significance thresholds. reduce Therefore, Alternative 1's construction emissions would potentially expose sensitive receptors to substantial concentrations, and impacts would be significant and unavoidable. Because Alternative 1 construction emissions would exceed the PM_{10} LST, Alternative 1 would cause or contribute to a violation of any health-protective CAAQS and NAAQS. Given that diesel particulate matter (DPM) emissions would constitute a portion of localized PM_{10} emissions, impacts related to localized DPM emissions during construction are also considered to be significant and unavoidable due to the following: (1) the elevated background carcinogenic risk, (2) the duration of construction activity, and (3) the proximity of sensitive receptors to DPM emissions sources.

Impact LUP-2: 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?

Alternative 1 would conflict with plans that prioritize the preservation of open space such as the *Santa Monica Mountains Conservancy Comprehensive Plan* (Santa Monica Mountains Comprehensive Commission, 1979) *Brentwood-Pacific Palisades Community Plan* (DCP, 1998a), and *Van Nuys-North Sherman Oaks Community Plan* (DCP, 1998d). Figure 3.10-8 shows the open space acquired for the Getty Center Station for Alternative 1.

Alternative 1 would require partial property acquisition of land uses designated as open space, including land in the Santa Monica Mountains owned by the State of California and maintained by the Santa Monica Mountains Conservancy and Mountain Recreation and Conservation Authority as well as land from Teichman Family Magnolia Park in Sherman Oaks. The proposed alignment of Alternative 1 would also require partial acquisition of the Mission Canyon Recreation Site to accommodate the aerial guideway and stations, traction power substation (TPSS) site locations, and retaining walls, which the City of Los Angeles designates as open space. The proposed development of transit infrastructure on land designated open space would not be consistent with the *Santa Monica Mountains Conservancy Comprehensive Plan* (Santa Monica Mountains Comprehensive Commission, 1979) and the *Brentwood-Pacific Palisades and Van Nuys-North Sherman Oaks Community Plans* (DCP, 1998a and 1998d, respectively).

While Alternative 1 would be consistent with regional and local transportation goals and policies for providing enhanced transportation access and reducing GHG emissions, Alternative 1 would still conflict with the *Brentwood-Pacific Palisades and Van Nuys-North Sherman Oaks Community Plans* and the *Santa Monica Mountains Conservancy Comprehensive Plan*, which prioritize protecting natural resources and open space. The proposed development of transit infrastructure on land designated open space within the Santa Monica Mountains in addition to the Tiechman Family Magnolia Park in Sherman Oaks for the proposed alignment, stations, and TPSS sites required for Alternative 1 would not be consistent with applicable land use plans, policies, or regulations. Alternative 1 would be required to implement

MM LUP-1, requiring Metro to coordinate with the Santa Monica Mountains Conservancy and City to amend the applicable plans, and work with the City to amend the Los Angeles Municipal Code (LAMC) to bring the project into conformity with those planning and zoning requirements. However, Metro cannot guarantee that the Santa Monica Mountains Conservancy and the City would adopt the necessary amendments, and Alternative 1 necessitates the acquisition of open space in the Brentwood and Van Nuys-North Sherman Oaks communities, as well as in the Santa Monica Mountains. Therefore, operation of Alternative 1 would have a significant and unavoidable impact related to conflicts with applicable land use plans, policies, or regulations.

Impact CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

Under Alternative 1, the Dai Siani Ristorante (Sherwood Coiffeurs) property would be acquired and demolished for the construction of a proposed aerial structure parallel to Interstate 405 (I-405). The Dai Siani Ristorante (Sherwood Coiffeurs) building is a one-story commercial building that is considered a significant historic resource for its 1950 Modern design. Physical demolition would materially impair the significance of the historical resource and would result in a significant and unavoidable impact.

Impact NOI-1: Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established by the Federal Transit Administration?

Alternative 1 would result in temporary and periodic increases in ambient noise levels due to construction activity that would exceed the Federal Transit Administration's (FTA) criteria, and where applicable, the standards established by the local noise ordinances. While MM NOI-1.2 would be implemented and include noise-reducing measures, there may still be temporary or periodic increases in ambient noise levels that exceed FTA construction impact criteria. There are no additional feasible mitigation measures to reduce construction noise levels. Therefore, impacts related to construction noise would be significant and unavoidable.

Impact NOI-2: Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Construction activities, such as pile driving, use of drill rigs, pavement breaking, and the use of tracked vehicles (e.g., bulldozers) and hoe rams, could result in perceptible levels of groundborne vibration (GBV) at sensitive buildings located in close proximity to construction sites. Project construction would include a limited number of activities expected to generate vibration that approaches the lowest building damage limit of 0.12 inch per second (in/sec) peak particle velocity (PPV). For example, use of a drilling rig, hoe ram, or large bulldozer would be safe at distances greater than 25 feet from Category IV buildings. At distances of 40 feet or less, a vibratory roller would begin to generate GBV levels that approach the building damage criterion of 0.12 in/sec PPV. Vibration annoyance is another concern during construction. In rare instances, when vibration-intensive construction activities occur close to sensitive structures (i.e., within 25 feet) such as residential buildings, or special use buildings like laboratories or recording studios, vibration could exceed the FTA vibration annoyance criteria.

Construction occurring in the area south of the Santa Monica Mountains would be in the urban environment and would have higher potential for construction equipment to operate within 25 feet or less of adjacent buildings. In particular, between Exposition Boulevard and Wilshire Boulevard, construction equipment could operate in proximity to buildings that would potentially result in building vibration damage or vibration annoyance. Construction activity would typically occur at distances

greater than 50 feet from sensitive buildings between Wilshire Boulevard, through the Santa Monica Mountains, and Green Leaf Street in the Valley because the alignment would be located in either in the right-of-way (ROW) of I-405 or in areas immediately adjacent to I-405, where there are limited to no structures. North of Greenleaf Street, the alignment would travel along the east side of I-405 in a constrained area with buildings adjacent to the construction footprint. The FTA building damage criteria and vibration annoyance criteria could potentially be exceeded at buildings in these areas.

While MM VIB-1.1 would be implemented and include vibration-reducing measures, there may still be temporary or periodic increases in vibration levels that exceed FTA construction vibration impact criteria. There are no additional feasible mitigation measures to reduce construction vibration levels. Therefore, impacts related to construction vibration would be significant and unavoidable related to GBV and GBN (groundborne noise).

3.20.3.3 Monorail Transit Maintenance and Storage Facility Base Design

Impact US-1: 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?

The MSF Base Design would conflict with LADWP's Mid-Valley Water Facility project which is proposed on the MSF Base Design site. The Mid-Valley Water Facility project would replace outdated buildings and trailers currently situated at various locations throughout the San Fernando Valley. The proposed facility is intended to improve efficiencies across LADWP divisions, support LADWP's mainline replacement program, and ensure infrastructure resiliency. Due to the conflict with the proposed facility, the MSF Base Design may result in the need to relocate or construct a new facility which may have significant environmental effects. Metro has been in coordination with LADWP and continued coordination is required to identify a solution to the conflict and determine if a new or relocated facility is required. In view of the known site requirements and operations proposed for the LADWP facility, it is anticipated that a new LADWP facility in a different location could cause significant environmental effects that may not be mitigated to a less-than-significant level. Therefore, the MSF Base Design would result in a significant and unavoidable impact related to the need to relocate or construct new water facilities.

Impact LUP-2: 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?

Operation of the proposed MSF Base Design would conflict with the LADWP Urban Water Management Plan (LADWP, 2020), which has identified this site for the Mid-Valley Water Facility project. Metro has been in coordination with LADWP and continued coordination is required to identify a solution to the conflict and determine if a new or relocated facility is required. Therefore, since the conflict with the proposed LADWP facility is unresolved and no solution has been identified, operation of the proposed MSF Base Design would result in a significant and unavoidable impact related to conflicting with local land use plans.

3.20.3.4 Alternative 3

Impact AQ-2: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Alternative 3's construction activities would generate criteria pollutant emissions from off-road equipment; mobile sources, including workers, vendor trucks, and haul trucks traveling to and from construction sites; demolition; soil handling activities; paving; applying architectural coatings; and operating temporary concrete batch plants. As described in Section 3.2, Air Quality, Alternative 3's construction emissions would exceed SCAQMD's regional significance thresholds for NO_X and CO emissions. Additionally, recognizing that SCAQMD's regional significance thresholds were established to achieve attainment of the NAAQS and CAAQS, which in turn define the maximum amount of an air pollutant that can be present in ambient air without harming public health, Alternative 3's contribution of pollutant emissions may result in appreciable human health impacts on a regional scale. Prolonged exposure to elevated NOx levels can lead to respiratory inflammation and decreased lung function, particularly for vulnerable populations such as children, the elderly, and individuals with pre-existing conditions like asthma or chronic obstructive pulmonary disease. Similarly, elevated CO levels can impair oxygen delivery to vital organs, potentially exacerbating cardiovascular conditions. Although MM AQ-1, MM AQ-2, and MM AQ-3 would reduce criteria pollutant emissions during construction, mitigation measures would not reduce Alternative 3 NO_X and CO emissions below SCAQMD significance thresholds; therefore, Alternative 3's construction emissions would result in a cumulatively considerable net increase of criteria pollutants for which the project region is non-attainment under an applicable federal or state ambient air quality standard, and impacts would be significant and unavoidable.

Impact AQ-3: Would the project expose sensitive receptors to substantial pollutant concentrations?

Alternative 3's localized emissions included exhaust emissions from off-road equipment and trucks, and fugitive dust from demolition, earth movement activities, and truck travel. Alternative 3's localized construction emissions would exceed the PM_{10} LST for construction activity in the Valley and Westside; therefore, Alternative 3's localized construction emissions would be potentially significant. Although MM AQ-1, MM AQ-2, and MM AQ-3 would reduce criteria pollutant emissions during construction, including localized PM_{10} emissions, mitigation measures would not reduce Alternative 3 PM_{10} emissions below SCAQMD localized significance thresholds. Therefore, Alternative 3's construction emissions would potentially expose sensitive receptors to substantial concentrations, and impacts would be significant and unavoidable. Because Alternative 3's construction emissions would exceed the PM_{10} LST, Alternative 3 would cause or contribute to a violation of any health-protective CAAQS and NAAQS. Given that DPM emissions constitute a portion of localized PM_{10} emissions, impacts related to localized DPM emissions during construction are also considered to be significant and unavoidable due to the following: (1) the elevated background carcinogenic risk, (2) the duration of construction activity, and (3) the proximity of sensitive receptors to DPM emissions sources.

Impact LUP-2: 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?

Alternative 3 would require the same acquisition of open space land as described for Alternative 1. This includes partial property acquisition of land in the Santa Monica Mountains, land from Teichman Family Magnolia Park in Sherman Oaks, and partial acquisition of the Mission Canyon Recreation Site.

Alternative 3 would be required to implement MM LUP-1, requiring Metro to coordinate with the Santa Monica Mountains Conservancy and City to amend the applicable plans, and work with the City to amend the LAMC to bring the project into conformity with those planning and zoning requirements. However, Metro cannot guarantee that the Santa Monica Mountains Conservancy and the City would adopt the necessary amendments, and Alternative 3 necessitates the acquisition of open space in the Brentwood and Van Nuys-North Sherman Oaks communities, as well as in the Santa Monica Mountains. Like Alternative 1, development of transit infrastructure on land designated open space proposed by Alternative 3 would be inconsistent with applicable land use plans, policies, or regulations and would result in significant and unavoidable impacts.

Impact CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

Like Alternative 1, Alternative 3 would acquire the Dai Siani Ristorante (Sherwood Coiffeurs) property and demolish the existing historic building for the construction of a proposed aerial structure parallel to I-405. Physical demolition of the building would materially impair the significance of the historical resource and would result in a significant and unavoidable impact.

Impact NOI-1: Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established by the Federal Transit Administration?

Alternative 3 would result in temporary and periodic increases in ambient noise levels due to construction activity that would exceed FTA's criteria, and where applicable, the standards established by the local noise ordinances. While MM NOI-3.2 would be implemented and include noise-reducing measures, there may still be temporary or periodic increases in ambient noise levels that exceed FTA construction impact criteria. There are no additional feasible mitigation measures to reduce construction noise levels. Therefore, impacts related to construction noise would be significant and unavoidable.

Impact NOI-2: Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Construction activities, such as pile driving, use of drill rigs, pavement breaking, and the use of tracked vehicles (e.g., bulldozers) and hoe rams, could result in perceptible levels of GBV at sensitive buildings located in close proximity to construction sites. Project construction would include a limited number of activities expected to generate vibration that approaches the lowest building damage limit of 0.12 in/sec PPV. For example, use of a drilling rig, hoe ram, or large bulldozer would be safe at distances greater than 25 feet from Category IV buildings. At distances of 40 feet or less, a vibratory roller would begin to generate GBV levels that approach the building damage criterion of 0.12 in/sec PPV. Vibration annoyance is another concern during construction. In rare instances, when vibration-intensive construction activities occur close to sensitive structures (i.e., within 25 feet) such as residential buildings, or special use buildings like laboratories or recording studios, vibration could exceed the FTA vibration annoyance criteria.

Along the underground alignment of Alternative 3, the TBM would be the main source of GBVs. However, the TBM is slow moving and causes very little vibration and related GBN to the surrounding area when operating at full tunnel depths. The Alternative 3 underground tunnel would be at depths of less than 20 feet to nearly 400 feet from the aboveground buildings along the tunnel alignment. In a few multi-family residential areas south of Wilshire Boulevard and residential buildings closest to the north

tunnel portal, GBV from the TBM may be distinctly felt for a short period (about 2 days) while the machine passes under the receptor locations. Throughout the rest of the tunnel alignment, GBV from the TBM would not be perceptible, or be just barely perceptible to some building occupants. Expected TBM vibration levels, however, would be well below the strictest building damage threshold of 0.12 in/sec. Construction of the Wilshire Boulevard/Metro D Line Station along the underground alignment would likely be cut-and-cover construction, which could result in aboveground vibration. However, buildings would typically be located more than 50 feet away from station construction and appear to be constructed of engineered concrete and masonry (0.3 in/sec threshold), resulting in limited potential for excessive vibration damage and annoyance. The alignment would surface in the Santa Monica Mountains near the Getty Center parking. Construction activity would typically occur at distances greater than 50 feet from sensitive buildings in the Santa Monica Mountains between the Getty Center and Green Leaf Street in the Valley as the alignment would be located in either the ROW of I-405 or areas immediately adjacent to I-405, where there are limited to no structures. The potential for vibration damage and annoyance would be limited in this area. North of Greenleaf Street, the alignment would travel along the east side of I-405 in a constrained area with buildings adjacent to the construction footprint. The FTA building damage criteria and vibration annoyance criteria could potentially be exceeded at buildings in these areas.

While MM VIB-3.1 would be implemented and include and vibration-reducing measures, there may still be temporary or periodic increases in vibration levels that exceed FTA construction vibration impact criteria. There are no additional feasible mitigation measures to reduce construction vibration levels. Therefore, impacts related to construction vibration would be significant and unavoidable related to GBV and GBN.

Impact GEO-8: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Alternative 3 would have a 3.7-mile underground alignment located to the east of I-405. The underground alignment would go north of Wilshire Boulevard, and travel underneath Westwood Village and the University of California, Los Angeles (UCLA), before returning to the I-405 corridor just south of the proposed Getty Center Station. The underground alignment would require a 43-foot-wide single-bore tunnel and two 8-foot-wide walkways/drive aisles flanking the tunnel. The tunnel would have a maximum depth of 440 feet below ground surface level before making its ascent to the surface. Additionally, Alternative 3 would have two underground monorail transit (MRT) stations, the Wilshire Boulevard/Metro D Line Station and the UCLA Gateway Plaza Station. The geologic units affected by the tunnel and two MRT stations would be young alluvium, unit 2 (Qya2), Modelo Formation sandstone (Tms), and Modelo Formation Topanga Group undivided (Tt). The units listed are not representative of what can be encountered below the surface level (Campbell et al., 2014).

An automated TBM would excavate the tunnels for the underground portion of Alternative 3. The TBM would excavate sediments to the dimensions of the finished tunnel, remove the sediments from the forward portion of the TBM via an internal conveyer belt, and erect the concrete walls of the tunnel. The operation of the TBM would not allow a paleontological monitor to view the sediments as they are being excavated or the walls of the tunnel following removal of excess sediments and prior to the installation of the tunnel's concrete walls. For these reasons, monitoring paleontological resources adjacent to the TBM is not possible. Thus, in accordance with CEQA Guidelines, excavations for tunnel construction would create significant and unavoidable impacts to paleontological resources in paleontologically sensitive geologic units. For more information refer to the *Sepulveda Transit Corridor Project Geotechnical, Subsurface, and Seismic Technical Report, Paleontological Resources Technical Memorandum*, Attachment 1, Figure 4 (Metro, 2025c).

3.20.3.5 Monorail Transit Maintenance and Storage Facility Base Design

Impact US-1: 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?

The MSF Base Design would conflict with LADWP's Mid-Valley Water Facility project which is proposed on the MSF Base Design site. The Mid-Valley Water Facility project would replace outdated buildings and trailers currently situated at various locations throughout the San Fernando Valley. The proposed facility is intended to improve efficiencies across LADWP divisions, support LADWP's mainline replacement program, and ensure infrastructure resiliency. Due to the conflict with the proposed facility, the MSF Base Design may result in the need to relocate or construct a new facility which may have significant environmental effects. Metro has been in coordination with LADWP and continued coordination is required to identify a solution to the conflict and determine if a new or relocated facility is required. In view of the known site requirements and operations proposed for the LADWP facility, it is anticipated that a new LADWP facility in a different location could cause significant environmental effects that may not be mitigated to a less-than-significant level. Therefore, the MSF Base Design would result in a significant and unavoidable impact related to the need to relocate or construct new water facilities.

Impact LUP-2: 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?

Operation of the proposed MSF Base Design would conflict with the LADWP Urban Water Management Plan (LADWP, 2020), which has identified this site for the Mid-Valley Water Facility project. Metro has been in coordination with LADWP and continued coordination is required to identify a solution to the conflict and determine if a new or relocated facility is required. Therefore, since the conflict with the proposed LADWP facility is unresolved and no solution has been identified, operation of the proposed MSF Base Design would result in a significant and unavoidable impact related to conflicting with local land use plans.

3.20.3.6 Alternative 4

Impact AQ-2: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Alternative 4 construction activities would generate criteria pollutant emissions from off-road equipment; mobile sources, including workers, vendor trucks, and haul trucks traveling to and from construction sites; demolition; soil handling activities; paving; applying architectural coatings; and operating temporary concrete batch plants. As described in Section 3.2, Air Quality, Alternative 4 construction emissions would exceed SCAQMD's regional significance thresholds for NO_X and CO emissions. Additionally, recognizing that SCAQMD's regional significance thresholds were established to achieve attainment of the NAAQS and CAAQS, which in turn define the maximum amount of an air pollutant that can be present in ambient air without harming public health, Alternative 4's contribution of pollutant emissions may result in appreciable human health impacts on a regional scale. Prolonged exposure to elevated NOx levels can lead to respiratory inflammation and decreased lung function, particularly for vulnerable populations such as children, the elderly, and individuals with pre-existing conditions like asthma or chronic obstructive pulmonary disease. Similarly, elevated CO levels can impair oxygen delivery to vital organs, potentially exacerbating cardiovascular conditions. Although MM AQ-1, MM AQ-2, and MM AQ-3 would reduce criteria pollutant emissions during construction, mitigation measures would not reduce Alternative 4 NO_X and CO emissions below SCAQMD significance thresholds; therefore, Alternative 4 construction emissions would result in a cumulatively considerable net increase of criteria pollutants for which the project region is non-attainment under an applicable federal or state ambient air quality standard, and impacts would be significant and unavoidable.

Impact AQ-3: Would the project expose sensitive receptors to substantial pollutant concentrations?

Alternative 4's localized emissions would include exhaust emissions from off-road equipment and trucks, and fugitive dust from demolition, earth movement activities, and truck travel. Alternative 4's localized construction emissions would exceed the PM_{10} and $PM_{2.5}$ LSTs for construction activity in the Valley and exceed the PM_{10} LST in the Westside; therefore, Alternative 4's localized construction emissions would be potentially significant. Although MM AQ-1, MM AQ-2, and MM AQ-3 would reduce criteria pollutant emissions during construction, including localized PM_{10} emissions, mitigation measures would not reduce Alternative 4 PM_{10} emissions below SCAQMD localized significance thresholds. Therefore, Alternative 4's construction emissions would potentially expose sensitive receptors to substantial concentrations, and impacts would be significant and unavoidable. Because Alternative 4's construction emissions would exceed the PM_{10} LST, Alternative 4 would cause or contribute to a violation of any health-protective CAAQS and NAAQS. Given that DPM emissions would constitute a portion of localized PM_{10} emissions, impacts related to localized DPM emissions during construction are also considered to be significant and unavoidable due to the following: (1) the elevated background carcinogenic risk, (2) the duration of construction activity, and (3) the proximity of sensitive receptors to DPM emissions sources.

Impact AES-3: Would the project, in non-urbanized areas, 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?

The aerial alignment of Alternative 4 would extend from Del Gado Drive along Sepulveda Boulevard to the Van Nuys Metrolink Station through the City of Los Angeles communities of Sherman Oaks and Van Nuys. A portal structure would be located on Del Gado Drive, where the underground tunnel would daylight to an aerial guideway, and the aerial guideway would continue north on Sepulveda Boulevard to the Ventura Boulevard/Sepulveda Boulevard Station. The aerial guideway would also include both center columns and expansive straddle bents that would support the aerial guideway. As such, operation of Alternative 4 would represent a change in views and visual quality and character as compared to the existing conditions. The addition of the Alternative 4 aerial alignment and associated infrastructure such as aerial stations, support columns and bents, and permanent alterations to commercial parcels along Sepulveda Boulevard would affect the visual character of the Sepulveda Boulevard corridor through Sherman Oaks and Van Nuys by introducing new visible vertical features that would block views from motorists, pedestrians, and residents along Sepulveda Boulevard. Viewer groups — including residents in this area — would notice the visual changes associated with Alternative 4.

As such, the aerial facilities would not be visually similar to infrastructure that already exists in the urban landscape along Sepulveda Boulevard. Overall, Alternative 4 would partially conflict with applicable zoning or other regulations governing scenic quality. Therefore, the operation of Alternative 4 would substantially degrade the existing visual character or quality of public views of the alignment and its surroundings and would result in a significant impact. There are no feasible mitigation measures to reduce this impact, and as such, it is significant and unavoidable.

Impact CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

Under Alternative 4, the proposed aerial Ventura Boulevard/Sepulveda Boulevard Station would be constructed approximately 200 feet from the side (south elevation) of the Rodeo Realty building, and the alignment would follow Sepulveda Boulevard approximately 30 feet from the front (east elevation) of the property. The Rodeo Realty building and its associated parking garage at 15300 Ventura Boulevard is considered a significant historic resource for its 1964 International Style design. The Ventura Boulevard/Sepulveda Boulevard Station would require a partial take of the Rodeo Realty parking garage, which is a character-defining feature of the resource. Physical demolition would materially impair the significance of the historical resource and would result in a significant and unavoidable impact.

Impact NOI-1: Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established by the Federal Transit Administration?

Alternative 4 would result in temporary and periodic increases in ambient noise levels due to construction activity that would exceed FTA's criteria, and where applicable, the standards established by the local noise ordinances. While MM NOI-4.2 would be implemented and include noise-reducing measures, there may still be temporary or periodic increases in ambient noise levels that exceed FTA construction impact criteria. There are no additional feasible mitigation measures to reduce

construction noise levels. Therefore, impacts related to construction noise would be significant and unavoidable.

Impact NOI-2: Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Construction activities, such as pile driving, use of drill rigs, pavement breaking, and the use of tracked vehicles (e.g., bulldozers) and hoe rams, could result in perceptible levels of GBV at sensitive buildings located in close proximity to construction sites. Project construction would include a limited number of activities expected to generate vibration that approaches the lowest building damage limit of 0.12 in/sec PPV. For example, use of a drilling rig, hoe ram, or large bulldozer would be safe at distances greater than 25 feet from Category IV buildings. At distances of 40 feet or less, a vibratory roller would begin to generate GBV levels that approach the building damage criterion of 0.12 in/sec PPV. Vibration annoyance is another concern during construction. In rare instances, when vibration-intensive construction activities occur close to sensitive structures (i.e., within 25 feet) such as residential buildings, or special use buildings like laboratories or recording studios, vibration could exceed the FTA vibration annoyance criteria.

Along the underground alignment of Alternative 4, the TBM would be the main source of GBVs. However, the TBM is slow moving and causes very little vibration and related GBN to the surrounding area when operating at full tunnel depths. The Alternative 4 underground tunnel would be at depths of approximately 30 feet to over 750 feet from the aboveground buildings along the tunnel alignment. In some residential areas, GBV from the TBM may be felt for a short period (about 2 days) while the machine passes under the receptor locations. In residential areas in the mountain region between Sunset Boulevard and the north tunnel portal, GBV from the TBM would not be perceptible because the tunnel would be very deep underground. Expected TBM vibration levels would be well below the strictest building damage threshold of 0.12 in/sec along the entire underground alignment. Construction of the Metro E Line Expo/Sepulveda and Santa Monica Boulevard Stations along the underground alignment would likely be cut-and-cover construction, which could at times occur within 25 feet of structures potentially resulting in excessive vibration. The alignment would surface in the Santa Monica Mountains near Del Gado Drive. Between Del Gado Drive and Ventura Boulevard, construction activity could occur at distances of 25 feet or less of adjacent buildings, including single-family residences, multi-family residences, and commercial buildings. Construction activity in this area could result in the exceedance of the FTA building damage or vibration annoyance criteria. North of Ventura Boulevard, construction activity would typically occur within the Sepulveda Boulevard ROW, and nearby buildings would typically be located at distances of 50 feet or greater, thus reducing the potential for vibration damage or annoyance. In some instances, construction activity may occur at closer distances to sensitive buildings or more intense vibration generating equipment (vibratory roller) may be used, which could potentially exceed the FTA building damage or vibration annoyance criteria. East of the intersection of Sepulveda Boulevard and Raymer Street, construction activity would primarily occur in the LOSSAN rail ROW, which is surrounded by industrial buildings and would have limited potential for vibration damage and annoyance.

While MM VIB-4.1 would be implemented and include vibration-reducing measures, there may still be temporary or periodic increases in vibration levels that exceed FTA construction vibration impact criteria. There are no additional feasible mitigation measures to reduce construction vibration levels. Therefore, impacts related to construction vibration would be significant and unavoidable related to GBV and GBN.

Impact GEO-8: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

More than half of the Alternative 4 rail alignment would be located underground. The proposed tunnel would be nearly 9 miles long and would begin in a tunnel that would be just east of Sepulveda Boulevard and south of National Boulevard. The proposed tunnel would have four underground stations and would transition from a tunnel to an elevated guideway that would go from Sepulveda Boulevard until Raymer Street, where it would turn southeast and run along the south side of the Amtrak/Metrolink corridor to Van Nuys Boulevard. The surface sediments that the elevated guideway would overlie are mapped as alluvium (Qa), young alluvium fan deposits, unit 1 (Qyf1), and young alluvium fan deposits, unit 2 (Qyf2). The units listed are not representative of what can be encountered below the surface level (Campbell et al., 2014).

It is difficult to specify for certain which units lie beneath these surface sediments. The areas where the heavy rail would transition to a tunnel would have a depth that would vary from 80 to 100 feet below the ground surface. The sediments mapped at the surface of where the Alternative 4 alignment would be constructed are mapped as Qya2, Modelo Formation undivided (Tm), Tms, Modelo Formation diatomaceous shale (Tmd), Santa Monica Slate spotted slate (Jsms), Santa Monica Slate undivided (Jsm), and Santa Monica Slate phyllite (Jsmp). As previously stated, knowing what is at depth is difficult to discern using only surface data. Geologic units such as the Santa Monica Slate (Jsm, Jsms, and Jsmp) do not have any paleontological sensitivity to preserve fossil material. Santa Monica Slate is a geologic unit that comprises metamorphic rock, which undergoes intense pressure and temperature and limits fossil preservation potential. This metamorphic process usually destroys and deforms any fossil material that could have been located within, but due to the relatively low grade of metamorphism, enough relevant features of the fossils were preserved (Imlay, 1963). Additionally, the Quaternary young alluvium (Qya2) has a low sensitivity due to limited potential for preserving fossil material because this unit is too young to have preserved any significant fossil material. The Modelo Formation labelled Tm, Tms, and Tmd all have a high sensitivity for preserving fossil material due to their age and the fossil localities found within the same map units nearby (SVP, 1995; Bell, 2023).

Like Alternative 3, Alterative 4 would include use of an automated TBM to excavate the tunnel for the underground portion of Alternative 4. The operation of the TBM would not allow a paleontological monitor to view the sediments as they are being excavated or the walls of the tunnel, following removal of excess sediments and prior to the installation of the tunnel's concrete walls. For these reasons, monitoring paleontological resources adjacent to the TBM would not be possible. Thus, in accordance with CEQA Guidelines, excavations for tunnel construction would create unavoidable significant impacts to paleontological resources in paleontologically sensitive geologic units. For more information refer to the *Sepulveda Transit Corridor Project Geotechnical, Subsurface, and Seismic Technical Report, Paleontological Resources Technical Memorandum,* Attachment 1, Figure 4 (Metro, 2025c).

3.20.3.7 Heavy Rail Transit Maintenance and Storage Facility

Impact US-1: 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?

Part of the proposed MSF would be located on a portion of LADWP property which is currently planned for Mid-Valley Water Facility project. The Mid-Valley Water Facility project would replace outdated buildings and trailers currently situated at various locations throughout the San Fernando Valley. The

proposed facility is intended to improve efficiencies across LADWP divisions, support LADWP's mainline replacement program, and ensure infrastructure resiliency. The MSF would conflict with implementation of this project. Due to the conflict with the proposed facility, the MSF may result in the need to relocate or construct a new facility which may have significant environmental effects. Metro has been in coordination with LADWP and continued coordination is required to identify a solution to the conflict and determine if a new or relocated facility is required. In view of the known site requirements and operations proposed for the LADWP facility, it is anticipated that a new LADWP facility in a different location could cause significant environmental effects that may not be mitigated to a less-than-significant level. Therefore, the MSF would result in a significant and unavoidable impact due to the need to relocate or construct new water facilities.

Impact LUP-2: 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?

Operation of the proposed MSF would conflict with the LADWP Urban Water Management Plan (LADWP, 2020), which has identified this site for the Mid-Valley Water Facility project. Metro has been in coordination with LADWP and continued coordination is required to identify a solution to the conflict and determine if a new or relocated facility is required. Therefore, since the conflict with the proposed LADWP facility is unresolved and no solution has been identified, operation of the proposed MSF would result in a significant and unavoidable impact related to conflicting with local land use plans

3.20.3.8 Alternative 5

Impact AQ-2: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Alternative 5 construction activities would generate criteria pollutant emissions from off-road equipment; mobile sources, including workers, vendor trucks, and haul trucks traveling to and from construction sites; demolition; soil handling activities; paving; applying architectural coatings; and operating temporary concrete batch plants. As described in Section 3.2, Air Quality, Alternative 5 construction emissions would exceed SCAQMD's regional significance thresholds for NO_X and CO emissions. Additionally, recognizing that SCAQMD's regional significance thresholds were established to achieve attainment of the NAAQS and CAAQS, which in turn define the maximum amount of an air pollutant that can be present in ambient air without harming public health, Alternative 5's contribution of pollutant emissions may result in appreciable human health impacts on a regional scale. Prolonged exposure to elevated NOx levels can lead to respiratory inflammation and decreased lung function, particularly for vulnerable populations such as children, the elderly, and individuals with pre-existing conditions like asthma or chronic obstructive pulmonary disease. Similarly, elevated CO levels can impair oxygen delivery to vital organs, potentially exacerbating cardiovascular conditions. Although MM AQ-1, MM AQ-2, and MM AQ-3 would reduce criteria pollutant emissions during construction, mitigation measures would not reduce Alternative 5 NOX and CO emissions below SCAQMD significance threshold; therefore, Alternative 5 construction emissions would result in a cumulatively considerable net increase of criteria pollutants for which the project region is non-attainment under an applicable federal or state ambient air quality standard, and impacts would be significant and unavoidable.

Impact AQ-3: Would the project expose sensitive receptors to substantial pollutant concentrations?

Alternative 5's localized emissions included exhaust emissions from off-road equipment and trucks, and fugitive dust from demolition, earth movement activities, and truck travel. Alternative 5's localized construction emissions would exceed the PM_{10} and $PM_{2.5}$ LSTs for construction activity in the Valley and exceed the PM_{10} LST in the Westside; therefore, Alternative 5's localized construction emissions would be potentially significant. Although MM AQ-1, MM AQ-2, and MM AQ-3 would reduce criteria pollutant emissions during construction, including localized PM_{10} emissions, mitigation measures would not reduce Alternative 5 PM_{10} emissions below SCAQMD localized significance thresholds. Therefore, Alternative 5's construction emissions would potentially expose sensitive receptors to substantial concentrations, and impacts would be significant and unavoidable. Because Alternative 5's construction emissions would exceed the PM_{10} LST, Alternative 5 would cause or contribute to a violation of any health-protective CAAQS and NAAQS. Given that DPM emissions constitute a portion of localized PM_{10} emissions, impacts related to localized DPM emissions during construction are also considered to be significant and unavoidable due to the following: (1) the elevated background carcinogenic risk, (2) the duration of construction activity, and (3) the proximity of sensitive receptors to DPM emissions sources.

Impact NOI-1: Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established by the Federal Transit Administration?

Alternative 5 would result in temporary and periodic increases in ambient noise levels due to construction activity that would exceed FTA's criteria, and where applicable, the standards established by the local noise ordinances. While MM NOI-5.1 would be implemented and include noise-reducing measures, there may still be temporary or periodic increases in ambient noise levels that exceed FTA construction impact criteria. There are no additional feasible mitigation measures to reduce construction noise levels. Therefore, impacts related to construction noise would be significant and unavoidable.

Impact NOI-2: Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Construction activities, such as pile driving, use of drill rigs, pavement breaking, and the use of tracked vehicles (e.g., bulldozers) and hoe rams, could result in perceptible levels of GBV at sensitive buildings located in close proximity to construction sites. Project construction would include a limited number of activities expected to generate vibration that approaches the lowest building damage limit of 0.12 in/sec PPV. For example, use of a drilling rig, hoe ram, or large bulldozer would be safe at distances greater than 25 feet from Category IV buildings. At distances of 40 feet or less, a vibratory roller would begin to generate GBV levels that approach the building damage criterion of 0.12 in/sec PPV. Vibration annoyance is another concern during construction. In rare instances, when vibration-intensive construction activities occur close to sensitive structures (i.e., within 25 feet) such as residential buildings, or special use buildings like laboratories or recording studios, vibration could exceed the FTA vibration annoyance criteria.

Along the underground alignment of Alternative 5, the TBM would be the main source of GBVs. However, the TBM is slow moving and causes very little vibration and related GBN to the surrounding area when operating at full tunnel depths. The Alternative 5 underground tunnel would be at depths of approximately 30 feet to over 750 feet from the aboveground buildings along the tunnel alignment. In some residential areas, GBV from the TBM may be felt for a short period (about 2 days) while the

machine passes under the receptor locations. In residential areas in the mountain region between Sunset Boulevard and Valley View Boulevard, GBV from the TBM would not be perceptible because the tunnel would be very deep underground. Expected TBM vibration levels would be well below the strictest building damage threshold of 0.12 in/sec along the entire underground alignment. Construction of the Metro E Line Expo/Sepulveda, Santa Monica Boulevard, Wilshire Boulevard/Metro D Line, UCLA, Ventura Boulevard, Metro G Line, and Sherman Way Stations along the underground alignment would likely be cut-and-cover construction, which could at times occur within 25 feet of structures potentially resulting in excessive vibration. The alignment would surface near the intersection of Raymer Street and Burnett Avenue. Nearby structures are primarily industrial and would be most similar to engineered and concrete masonry buildings with a 0.3 in/sec vibration damage threshold. Vibration annoyance impacts are unlikely to occur in this area, as the uses are not vibration sensitive. However, due to the proximity of nearby buildings there is potential for vibration damage to occur. East of the tunnel portal, construction activity would primarily occur in the rail ROW, which is surrounded by industrial buildings and would have limited potential for vibration damage and annoyance.

While MM VIB-5.1 would be implemented and include vibration-reducing measures, there may still be temporary or periodic increases in vibration levels that exceed FTA construction vibration impact criteria. There are no additional feasible mitigation measures to reduce construction vibration levels. Therefore, impacts related to construction vibration would be significant and unavoidable related to GBV and GBN.

Impact GEO-8: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Alternative 5 would involve a heavy rail system with the majority of the proposed rail to be located under the ground surface. The proposed tunnel would extend the existing tunnel system from the Metro D Line north along Sepulveda Boulevard. Alternative 5 would have seven underground stations (Sherman Way, Metro G Line, Ventura Boulevard, UCLA Gateway Plaza, Wilshire Boulevard/Metro D Line, Santa Monica Boulevard, Metro E Line Expo/Sepulveda) and one aerial station (Van Nuys Metrolink). Alternative 5 would mostly affect sediments that are located below the ground surface. As previously stated, knowing for certain what geologic units will be affected at depth is difficult to say for certain without someone monitoring the sediments in any given working area. However, the sediments mapped along the Alternative 5 alignment are mapped as Qya2, Qyf1, Qyf2, Tm, Tms, Tmd, Jsms, Jsm, and Jsmp. Generally, geologic units such as the Santa Monica Slate (Jsms, Jsmp) do not have any paleontological sensitivity to preserve fossil material. The Santa Monica Slate is a geologic unit that comprises metamorphic rock, which undergoes intense pressure and temperature. This metamorphic process usually destroys and deforms any fossil material that could have been located within the rock; however, because of the relatively low grade of metamorphism, enough relevant features of the fossils were preserved in portions of the Santa Monica Slate. When the Santa Monica Slate (Jsms, Jsmp) is encountered, the project paleontologist would determine whether low-grade metamorphic conditions are present. If that is the case, that portion of the unit (Jsms) may be considered “Low” paleontological sensitivity and monitored accordingly (Imlay, 1963). Additionally, the Qyf1, Qyf2, and Qya2 units have a “Low” sensitivity for preserving fossil material, because these units are too young to have preserved any significant fossil material. The geologic map unit labelled as Tm, Tms, and Tmd all have a high sensitivity for preserving fossil material due to their age, as well as the fossil localities found within the same map units nearby (SVP, 1995; Bell, 2023).

Like Alternative 4, Alterative 5 would include use of an automated TBM to excavate the tunnel for the underground portion of Alternative 5. The operation of the TBM would not allow a paleontological

monitor to view the sediments as they are being excavated or the walls of the tunnel following removal of excess sediments and prior to the installation of the tunnel's concrete walls. For these reasons, monitoring paleontological resources adjacent to the TBM would not be possible. Thus, in accordance with CEQA Guidelines, excavations for tunnel construction would create unavoidable significant impacts to paleontological resources in paleontologically sensitive geologic units. For more information refer to the *Sepulveda Transit Corridor Project Geotechnical, Subsurface, and Seismic Technical Report, Paleontological Resources Technical Memorandum*, Attachment 1, Figure 4 (Metro, 2025c).

3.20.3.9 Heavy Rail Transit Maintenance and Storage Facility

Impact US-1: 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?

Part of the proposed MSF would be located on a portion of LADWP property which is currently planned for Mid-Valley Water Facility project. The Mid-Valley Water Facility project would replace outdated buildings and trailers currently situated at various locations throughout the San Fernando Valley. The proposed facility is intended to improve efficiencies across LADWP divisions, support LADWP's mainline replacement program, and ensure infrastructure resiliency. The MSF would conflict with implementation of this project. Due to the conflict with the proposed facility, the MSF may result in the need to relocate or construct a new facility which may have significant environmental effects. Metro has been in coordination with LADWP and continued coordination is required to identify a solution to the conflict and determine if a new or relocated facility is required. In view of the known site requirements and operations proposed for the LADWP facility, it is anticipated that a new LADWP facility in a different location could cause significant environmental effects that may not be mitigated to a less-than-significant level. Therefore, the MSF would result in a significant and unavoidable impact due to the need to relocate or construct new water facilities.

Impact LUP-2: 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?

Operation of the proposed MSF would conflict with the LADWP Urban Water Management Plan (LADWP, 2020), which has identified this site for the Mid-Valley Water Facility project. Metro has been in coordination with LADWP and continued coordination is required to identify a solution to the conflict and determine if a new or relocated facility is required. Therefore, since the conflict with the proposed LADWP facility is unresolved and no solution has been identified, operation of the proposed MSF would result in a significant and unavoidable impact related to conflicting with local land use plans.

3.20.3.10 Alternative 6

Impact AQ-2: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Alternative 6 construction activities would generate criteria pollutant emissions from off-road equipment; mobile sources, including workers, vendor trucks, and haul trucks traveling to and from construction sites; demolition; soil handling activities; paving; applying architectural coatings; and operating temporary concrete batch plants. As described in Section 3.2, Air Quality, Alternative 6

construction emissions would exceed SCAQMD's regional significance thresholds for NO_X emissions. Additionally, recognizing that SCAQMD's regional significance thresholds were established to achieve attainment of the NAAQS and CAAQS, which in turn define the maximum amount of an air pollutant that can be present in ambient air without harming public health, Alternative 6's contribution of pollutant emissions may result in appreciable human health impacts on a regional scale. Prolonged exposure to elevated NOx levels can lead to respiratory inflammation and decreased lung function, particularly for vulnerable populations such as children, the elderly, and individuals with pre-existing conditions like asthma or chronic obstructive pulmonary disease. Although MM AQ-1, MM AQ-2, and MM AQ-3 would reduce criteria pollutant emissions during construction, mitigation measures would not reduce Alternative 6 NO_X emissions below SCAQMD significance thresholds Therefore, Alternative 6 construction emissions would result in a cumulatively considerable net increase of criteria pollutants for which the project region is non-attainment under an applicable federal or state ambient air quality standard, and impacts would be significant and unavoidable.

Impact AQ-3: Would the project expose sensitive receptors to substantial pollutant concentrations?

Alternative 6's localized emissions included exhaust emissions from off-road equipment and trucks, and fugitive dust from demolition, earth movement activities, and truck travel. Alternative 6's localized construction emissions would exceed the PM_{10} LST for construction activity in the Valley and Westside; therefore, Alternative 6's localized construction emissions would be potentially significant. Although MM AQ-1, MM AQ-2, and MM AQ-3 prescribed as follows would reduce criteria pollutant emissions during construction, including localized PM_{10} emissions, mitigation measures would not reduce Alternative 6 PM_{10} emissions below SCAQMD localized significance thresholds; therefore, Alternative 6's construction emissions would potentially expose sensitive receptors to substantial concentrations, and impacts would be significant and unavoidable. Because Alternative 6's construction emissions would exceed the PM_{10} LST, Alternative 6 would cause or contribute to a violation of any health-protective CAAQS and NAAQS. Given that DPM emissions constitute a portion of localized PM_{10} emissions, impacts related to localized DPM emissions during construction are also considered to be significant and unavoidable due to the following: (1) the elevated background carcinogenic risk, (2) the duration of construction activity, and (3) the proximity of sensitive receptors to DPM emissions sources.

Impact CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

Under Alternative 6, the Bill's Valley Car Wash property would be acquired and demolished for the construction of the proposed Van Nuys Metrolink Station. The Bill's Valley Car Wash building at 7530 Van Nuys Boulevard is a commercial property that is significant for its role in the commercial and industrial development of Van Nuys and for its 1962 Googie design. Physical demolition would materially impair the significance of the historical resource and would result in a significant and unavoidable impact.

Impact NOI-1: Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established by the Federal Transit Administration?

Alternative 6 would result in temporary and periodic increases in ambient noise levels due to construction activity that would exceed FTA's criteria, and where applicable, the standards established by the local noise ordinances. While MM NOI-6.2 would be implemented and include noise-reducing measures, there may still be temporary or periodic increases in ambient noise levels that exceed FTA

construction impact criteria. There are no additional feasible mitigation measures to reduce construction noise levels. Therefore, impacts related to construction noise would be significant and unavoidable.

Impact NOI-2: Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Construction activities, such as pile driving, use of drill rigs, pavement breaking, and the use of tracked vehicles (e.g., bulldozers) and hoe rams, could result in perceptible levels of GBV at sensitive buildings located in close proximity to construction sites. Project construction would include a limited number of activities expected to generate vibration that approaches the lowest building damage limit of 0.12 in/sec PPV. For example, use of a drilling rig, hoe ram, or large bulldozer would be safe at distances greater than 25 feet from Category IV buildings. At distances of 40 feet or less, a vibratory roller would begin to generate GBV levels that approach the building damage criterion of 0.12 in/sec PPV. Vibration annoyance is another concern during construction. In rare instances, when vibration-intensive construction activities occur close to sensitive structures (i.e., within 25 feet) such as residential buildings, or special use buildings like laboratories or recording studios, vibration could exceed the FTA vibration annoyance criteria.

Along the underground alignment of Alternative 6, the TBM would be the main source of GBVs. However, the TBM is slow moving and causes very little vibration and related GBN to the surrounding area when operating at full tunnel depths. The Alternative 6 underground tunnels would be at depths of approximately 40 feet to over 700 feet from the aboveground buildings along the tunnels alignment. In some residential areas, GBV from the TBM may be felt for a short period (about 2 days) while the machine passes under the receptor locations. In residential areas in the mountain region between Sunset Boulevard and Mulholland Drive, GBV from the TBM would not be perceptible because the tunnels would be very deep underground. Expected TBM vibration levels would be well below the strictest building damage threshold of 0.12 in/sec along the entire alignment. In some residential areas, GBV from the TBM may be felt for a short period (about 2 days) while the machine passes under the receptor locations. Construction of the Metro E Line Expo/Sepulveda, Santa Monica Boulevard, Wilshire/Metro D Line, UCLA, Ventura Boulevard, Metro G Line, and Van Nuys Metrolink Stations along the underground alignment would likely be cut-and-cover construction, which could at times occur within 25 feet of structures, therefore, potentially resulting in excessive vibration. Regarding the mid-mountain shaft, the nearest structures would be located more than 500 feet to the east of construction activity and there would be no potential for vibration damage or annoyance impacts to occur.

While MM VIB-6.1 would be implemented and include vibration-reducing measures, there may still be temporary or periodic increases in vibration levels that exceed FTA construction vibration impact criteria. There are no additional feasible mitigation measures to reduce construction vibration levels. Therefore, impacts related to construction vibration would be significant and unavoidable related to GBV and GBN.

Impact GEO-8: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Alternative 6 would utilize an underground heavy rail system with seven underground stations. The geologic units mapped within the project footprint for Alternative 6 are Qya2, Qyf1, Qyf2, Tm, Tms, Tt, Tmd, Cretaceous tonalite (Kt), Jsms, and Jsmp. Kt was formed by the cooling of molten rock and thus cannot contain fossils, the Santa Monica Slate – Phyllite (Jsmp), and artificial fill (af(), have “No” paleontological sensitivity. As previously stated, knowing for certain what geologic units will be

impacted at depth is difficult to specify without on-site monitoring the sediments in any given working area. However, the sediments mapped at the surface of where the tunnel system will go for Alternative 6 are mapped as Qya2, Qyf1, Qyf2, Tm, Tms, Tt, Tmd, Jsms, Jsm, and Jsmp. Generally, geologic units such as the Santa Monica Slate (Jsms and Jsmp) do not have any paleontological sensitivity to preserve fossil material. The Santa Monica Slate is a geologic unit consisting of metamorphic rock, which undergoes intense pressure and temperature, chemically altering it from the original form. This metamorphic process usually destroys and deforms any fossil material that could have been located within; however, because of the relatively low grade of metamorphism, enough relevant features of the fossils were preserved in portions of the Santa Monica Slate. When the portion of the Santa Monica Slate with "Unknown" sensitivity (Jsms) is encountered, the project paleontologist would need to determine if low-grade metamorphic conditions are present. If that is the case, that portion of the unit (Jsms) may be considered "Low" paleontological sensitivity and monitored accordingly (Imlay, 1963). Additionally, the Qyf1, Qyf2, and Qya2 have a "Low" sensitivity for preserving fossil material because these units are too young to have preserved any significant fossil material. The geologic map units labelled as Tm, Tms, Tmd, and Tt all have a high sensitivity for preserving fossil material due to their age, as do the fossil localities found within the same map units nearby (Bell, 2023).

An automated TBM would excavate the tunnels for the underground portion of Alternative 6. The TBM would excavate sediments to the dimensions of the finished tunnel, remove the sediments from the forward portion of the TBM via an internal conveyer belt, and erect the concrete walls of the tunnel. The operation of the TBM would not allow the paleontological monitor to view the sediments as they are being excavated or the walls of the tunnel following removal of excess sediments and prior to the installation of the tunnel's concrete walls. For these reasons, monitoring paleontological resources adjacent to the TBM would not be possible. Thus, in accordance with CEQA Guidelines, excavations for tunnel construction would create significant unavoidable impacts to paleontological resources in paleontologically sensitive geologic units. For more information refer to the *Sepulveda Transit Corridor Project Geotechnical, Subsurface, and Seismic Technical Report, Paleontological Resources Technical Memorandum*, Attachment 1, Figure 4 (Metro, 2025c).

3.20.3.11 Heavy Rail Transit Maintenance and Storage Facility

Impact US-1: 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?

Part of the proposed MSF would be located on a portion of LADWP property which is currently planned for Mid-Valley Water Facility project. The Mid-Valley Water Facility project would replace outdated buildings and trailers currently situated at various locations throughout the San Fernando Valley. The proposed facility is intended to improve efficiencies across LADWP divisions, support LADWP's mainline replacement program, and ensure infrastructure resiliency. The MSF would conflict with implementation of this project. Due to the conflict with the proposed facility, the MSF may result in the need to relocate or construct a new facility which may have significant environmental effects. Metro has been in coordination with LADWP and continued coordination is required to identify a solution to the conflict and determine if a new or relocated facility is required. In view of the known site requirements and operations proposed for the LADWP facility, it is anticipated that a new LADWP facility in a different location could cause significant environmental effects that may not be mitigated to a less-than-

significant level. Therefore, the MSF would result in a significant and unavoidable impact due to the need to relocate or construct new water facilities.

Impact LUP-2: 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?

Operation of the proposed MSF would conflict with the LADWP Urban Water Management Plan (LADWP, 2020), which has identified this site for the Mid-Valley Water Facility project. Metro has been in coordination with LADWP and continued coordination is required to identify a solution to the conflict and determine if a new or relocated facility is required. Therefore, since the conflict with the proposed LADWP facility is unresolved and no solution has been identified, operation of the proposed MSF would result in a significant and unavoidable impact related to conflicting with local land use plans.

3.20.4 Significant Irreversible Environmental Changes

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

> *Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*

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

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

Constructing Alternatives 1, 3, 4, 5, or 6 would entail a one-time, irreversible, and irretrievable commitment of nonrenewable resources such as energy (fossil fuels used for construction vehicles and equipment and in the manufacturing process for project components) and construction materials (such as lumber, sand, gravel, metals, and water). In addition, labor and natural resources would be used to produce construction materials that are not generally retrievable. However, these materials are generally not in short supply and usage would not result in a significant impact to continued availability of these resources.

Constructing the project alternatives would also require a substantial one-time expenditure, which is not retrievable, of local and perhaps federal funds. This expense would be offset by the direct and indirect benefits to the local and regional economy from new construction employment, purchases of construction materials and services, and long-term economic development opportunities resulting from the transit improvements in the Study Area.

Land used to construct proposed facilities is considered an irreversible commitment during the period the land is used. After construction is completed, the Project would potentially commit land at stations, park-and-ride facilities, the proposed MSF, and street right-of-way to transit uses. Some station pedestrian entrances and maintenance facilities for the Project would be located on sites with existing commercial, retail, and industrial uses, and would not require a substantial land commitment. The commitment of long-term land resources is consistent with the policies of the County of Los Angeles and local jurisdictions within the Project Area that promote transit uses, as discussed in Section 4.2, Land Use and Development, of this DEIR.

The consumption of nonrenewable resources related to the Project alternatives would include water, petroleum products, and electricity. Fossil fuels would also be used for transporting workers and materials during construction, and electricity and fuel would be used for trains, stations, and worker vehicles for maintenance and operation during the life of the Project. The amount and rate of consumption of these resources would not result in significant environmental impacts or the unnecessary, inefficient, or wasteful use of such resources, because they would decrease automobile use (which uses fossil fuels) and would comply with state, regional, and local policies related to energy efficiency as described in Section 3.5, Energy of this DEIR. The Sepulveda Transit Corridor Project benefits would include improved mobility, transit accessibility, and time savings. In addition, the project alternatives would result in total annual net energy savings compared with the No Build Alternative (2045). The resources committed and consumed for the project alternatives would be considered appropriate because regional and local area residents and visitors would benefit from improved transit services, which, in turn, would result in an overall decrease in the irreversible and irretrievable commitment of nonrenewable resources.

The Project would remove passenger cars from the regional roadway network, easing the increase in vehicle miles traveled and the usage of fossil fuels.

Household-type cleaning materials such as detergents and cleansers would be used in the maintenance of project facilities (i.e., stations, transit vehicles, and the MSF). Oil, solvents, and other materials would be used for train maintenance in relatively small volumes and these are not considered acutely hazardous materials according to the National Institute of Health. There is the potential for hazardous materials/waste spills to occur; however, the storage and disposal of hazardous materials/waste would be conducted in accordance with all federal and state requirements to prevent or manage hazards, as discussed in Section 3.8, Hazards and Hazardous Materials, of this DEIR.

In the unlikely event that a spill does occur, remediation would be conducted accordingly. Therefore, there would be a minimal risk of irreversible damage caused by an environmental accident associated with hazardous or acutely hazardous materials.

3.20.5 Mandatory Findings of Significance

CEQA requires that an EIR be prepared when certain specified impacts may result from construction or implementation of a project. Under Section 15065(a) of the CEQA Guidelines, a finding of significance is required if a project “has the potential to substantially degrade the quality of the environment.” In practice, this is the same standard as a significant effect on the environment, which is defined in Section 15382 of the CEQA Guidelines as “a substantial or potentially substantial adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance.”

This DEIR addresses all of the Mandatory Findings of Significance through Chapter 3. Specific questions pertaining to Mandatory Findings of Significance from Appendix G of the CEQA Guidelines are as follows:

- 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, 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?
- Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?
- 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)?
- Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

This DEIR, in its entirety, addresses and discloses all potential environmental effects associated with implementation of the Project, including direct, indirect, and cumulative impacts; feasible mitigation measures; and the level of significance after the incorporation of mitigation measures in the following resource areas:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise and Vibration
- Population, Housing, and Growth
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and System Services
- Wildfire
- Cumulative Impacts