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Initial Study

Transportation Communications Network Program

PREPARED FOR:

Los Angeles County Metropolitan Transportation Authority

April 2022

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1 INTRODUCTION

The Los Angeles County Metropolitan Transportation Authority (Metro), as Lead Agency, has determined that the Transportation Communication Network Program (Project or TCN Program), inclusive of the associated enabling Zoning Ordinance (Zoning Ordinance) in the City of Los Angeles (the City), is subject to the California Environmental Quality Act (CEQA). This Initial Study evaluates the potential environmental effects that could result from the Zoning Ordinance, construction, and operation of the Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.) and the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.). Based on the analysis provided within this Initial Study, Metro has concluded that the Project may result in significant impacts on the environment and the preparation of an Environmental Impact Report (EIR) is required. This Initial Study (and the forthcoming EIR) are intended as informational documents, which are ultimately required to be considered and certified by the Lead Agency prior to approval of the Project.

1.1 PURPOSE OF AN INITIAL STUDY

CEQA was enacted in 1970 with several basic purposes, including: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration is appropriate. If the Initial Study concludes that neither a Negative Declaration nor Mitigated Negative Declaration is appropriate, an EIR is normally required. Additionally, an Initial Study may also be prepared to identify the potential significant effects of a project to study in an EIR, and scope out of the EIR those impacts that will be less than significant.

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1 INTRODUCTION

Describes the purpose and content of the Initial Study and provides an overview of the CEQA process.

2 EXECUTIVE SUMMARY

Provides Project information, identifies key areas of environmental concern, and includes a determination whether the project may have a significant effect on the environment.

3 PROJECT DESCRIPTION

Provides a description of the environmental setting and the Project, including project characteristics and a list of discretionary actions.

4 EVALUATION OF ENVIRONMENTAL IMPACTS

Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

1.3 CEQA PROCESS

Below is an overview of the CEQA process for the proposed Project. The CEQA process complies with the CEQA statutes and guidelines, which can be found on the State of California's website (http://files.resources.ca.gov/ceqa).

1.3.1 Initial Study

At the onset of the environmental review process, the Lead Agency prepared this Initial Study to determine if the proposed Project may have a significant effect on the environment. This Initial Study determined that the proposed Project may have a significant effect(s) on the environment and an EIR will be prepared.

A Notice of Preparation (NOP) was prepared to notify public agencies and the general public that the Lead Agency plans to prepare an EIR for the proposed project. The NOP and Initial Study are being circulated for a 45-day review and comment period. During this review period, the Lead Agency requests comments from agencies and the public on the scope and content of the environmental information to be included in the EIR. After the close of the 45-day review and comment period, the Lead Agency will continue to prepare the Draft EIR and any associated technical studies, which may be expanded in consideration of the comments received on the NOP.

1.3.2 Draft EIR

Once the Draft EIR is complete, a Notice of Completion and Availability will be prepared and issued to inform public agencies and the general public of the availability of the document and the locations where the document can be reviewed. The Draft EIR and Notice of Availability will be circulated for a 45-day review and comment period. The purpose of this review and comment period is to provide public agencies and the general public an opportunity to review the Draft EIR and comment on the document, including the analysis of environmental effects, the mitigation measures presented to reduce potentially significant impacts, and the alternatives analysis. After the close of the 45-day review and comment period, responses to comments on environmental issues received during the comment period will be prepared.

1.3.3 Final EIR

The Lead Agency prepares a Final EIR, which incorporates the Draft EIR or a revision to the Draft EIR, comments received on the Draft EIR and list of commenters, and responses to significant environmental points raised in the review and consultation process.

The Lead Agency then consider the Final EIR, together with any comments received during the public review process, and may certify the Final EIR and approve the project. In addition, when approving the Project, the Lead Agency must prepare findings for each significant effect identified, a statement of overriding considerations if there are significant impacts that cannot be mitigated, and a mitigation monitoring program. Finally, the City of Los Angeles, as a responsible agency, will rely on the certified EIR in its consideration of approving the Zoning Ordinance, and may be required to adopt findings and a statement of overriding consideration for significant impacts prior to approving the enabling Ordinance.

2 EXECUTIVE SUMMARY

PROJECT TITLE	**Transportation Communications Network Program**

PROJECT LOCATION	**34 Freeway-Facing Locations and 22 Non-Freeway-Facing Locations**
COMMUNITY PLAN AREAS:	Central City North, Silver Lake–Echo Park–Elysian Valley, Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass, North East Los Angeles, Boyle Heights, Central City, North Hollywood–Village Valley, Sun Valley–La Tuna Canyon, Arleta–Pacoima, Granada Hills–Knollwood, Sylmar, Encino–Tarzana, and West Los Angeles Community Plan areas
GENERAL PLAN DESIGNATIONS:	Commercial, Public Facilities, and Manufacturing uses
ZONING:	Commercial, Public Facilities, and Manufacturing uses
COUNCIL DISTRICTS:	1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, and 14

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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

- ☒ Aesthetics
- ☐ Agriculture & Forestry Resources
- ☒ Air Quality
- ☒ Biological Resources
- ☒ Cultural Resources
- ☒ Energy
- ☒ Geology/Soils
- ☒ Greenhouse Gas Emissions
- ☒ Hazards & Hazardous Materials
- ☐ Hydrology/Water Quality
- ☒ Land Use/Planning
- ☐ Mineral Resources
- ☒ Noise
- ☐ Population/Housing
- ☐ Public Services
- ☐ Recreation
- ☒ Transportation
- ☒ Tribal Cultural Resources
- ☒ Utilities/Service Systems
- ☐ Wildfire
- ☒ Mandatory Findings of Significance

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☒ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

John Potts, Executive Officer – Real Estate	April 14, 2022
PRINTED NAME, TITLE	**DATE**

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Los Angeles County Metropolitan Transportation Authority (Metro) proposes to implement the Transportation Communication Network (TCN) Program (Project or TCN Program), which would provide a network of structures with digital displays (TCN Structures) that would incorporate intelligent technology components to promote roadway efficiency, improve public safety, augment Metro's communication capacity, provide for outdoor advertising where revenues would fund new and expanded transportation programs consistent with the goals of the Metro 2028 Vision Plan, and result in an overall reduction in static signage displays throughout the City of Los Angeles (City). Implementation of the Project would include the installation of up to 34 Freeway-Facing TCN Structures and 22 Non-Freeway Facing TCN Structures all on Metro-owned property. The total maximum amount of digital signage associated with the TCN structures would be up to approximately 65,000 square feet. As part of implementation of the TCN Structures, a take-down program would also be implemented whereby existing static displays would be removed. Signage to be removed would include approximately 200 static displays on Metro-owned property located within the City.

As part of the Project, the City must amend the City's sign regulations in the Zoning Code (Zoning Ordinance) to create a mechanism to review and approve the TCN Structures Citywide. The regulations would generally affect the location, design, operations, take-down program and community benefits of the TCN Structures. General digital display and illumination standards would be adopted to support the implementation of the TCN Structures. The Zoning Ordinance, and other potential associated Zoning Code and General and/or Specific Plan amendments, would create a new class of signage for the TCN Structures given their unique attributes and intelligent technology. However, due to its inclusion of off-premise advertising, an exception to the City's general ban on new off-premise signs outside of Sign Districts, Specific Plans, and Supplemental Use Districts would be required.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location and Existing Conditions

The site locations for the TCN Structures (Site Locations) are located within property owned and operated by Metro along freeways and major streets, within the City. A portion of the Site Locations contain existing static displays. The majority of the Site Locations are located on vacant land with limited vegetation and are generally inaccessible to the public. Further, the proposed sites are used primarily for Metro operations which include rail corridors, stations, parking, bus depots, and equipment lots. The site locations are located within the Central City North, Silver Lake–Echo Park–Elysian Valley, Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass, North East Los Angeles, Boyle Heights, Central City, North Hollywood–Village Valley, Sun Valley–La Tuna Canyon, Arleta–Pacoima, Granada Hills–Knollwood, Sylmar, Encino–Tarzana, and West Los Angeles Community Plan areas and are generally designated and zoned as commercial, public facilities, and manufacturing uses. No site locations are zoned for residential use.

The Zoning Ordinance enabling the implementation of the TCN Program would apply throughout the City. The City has an approximate land area of 478 square miles (297,600 acres) with a population of nearly four million residents in 2020. The City lies within Los Angeles County which encompasses 4,000 square miles, 88 incorporated cities, and more than 10 million residents.[1] The City is divided into 15 City Council Districts and 35 Community Plan Areas. More than 87 percent of the City is developed with urban uses.

Commercial zoning within the City is typically concentrated along major thoroughfares due to economic and mobility access, as well as to provide a buffer between residential uses and major commercial and industrial areas. Residential zoning is the predominant zoning classification throughout the City. Industrial zoning is concentrated in strategic nodes throughout the City, and is generally buffered by commercial uses to provide separation from residential uses.

The City has roughly 8,000 off-premise signs within its boundaries, the vast majority of which are static signs, with a large majority located along surface streets. These off-premise signs are predominantly along commercial and industrial thoroughfares, with roughly 500 signs located on residentially zoned properties. The vast majority of these off-premise signs pre-date the City's ban on new off-premise signs which was enacted in 2002. The ban on new off-premise signs also prohibits conversion of existing signs to digital displays, and any new off-premise sign must be within an adopted Sign District, Specific Plan, or Supplemental Use District which preclude the ability to put signage on residentially zoned properties. The City currently has approximately 15 adopted Sign Districts, though not all allow for off-premise signs. Adopted Sign Districts are scattered throughout the City.

3.2.2 Surrounding Land Uses

As discussed above, the TCN Structures would be located adjacent to freeways and major roadways on Metro-owned properties. The majority of the TCN Structures would be located within commercial/ industrial areas where there is a mix of uses such as manufacturing, warehouse, retail, studios, storage, and surface parking, although some may be near or adjacent to residential uses.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

As summarized above, Metro proposes to implement the TCN Program, which would provide a network of TCN Structures that would incorporate intelligent technology components to promote roadway efficiency, improve public safety, increase communication, and provide for outdoor advertising that would be used to fund new and expanded transportation programs consistent with the goals of the Metro Vision 2028 Plan. The TCN Program also includes the removal of existing static signage throughout the City. Implementation of the Project would include the installation of up to 34 Freeway-Facing (FF) TCN Structures and 22 Non-Freeway Facing (NFF) TCN Structures, all on Metro-owned property. The total maximum amount of digital signage associated with the TCN Structures would be up to approximately 65,000 square feet. As part of implementation of the TCN Structures, a take-down program would also be implemented whereby existing static displays would be removed. Signage to be removed would include

[1] United States Census Bureau Quick Facts, City and County of Los Angeles, 2020, Census.gov/quickfacts/US, accessed April 4, 2022.

approximately 200 static displays on Metro-owned property located within the City. The City would establish a Zoning Ordinance that would provide a mechanism to review and approve the TCN Structures citywide. The Zoning Ordinance would regulate the location, operation, design, take-down program and community benefits of the TCN Structures. The Zoning Ordinance would also impose digital display and illumination standards to support the TCN Structures. A more detailed description of the TCN Program components is provided in Section 3.3.2.

3.3.2 Project Components

3.3.2.1 TCN Components

Intelligent Technology

The TCN Structures would be equipped with Metro's Regional Integration of Intelligent Transportation Systems (RIITS), which provides comprehensive, timely, and real-time information between freeway, traffic, transit, and emergency systems, and across various agencies, including Caltrans District 7, the City of Los Angeles Department of Transportation (LADOT), California Highway Patrol (CHP), Foothill Transit, Los Angeles County Department of Public Works, and other local and regional transit agencies, to improve traffic and transportation systems, and to disseminate information regarding roadway improvements, and during emergency events. The additional intelligent technology components of the TCN Program would assist Metro in increasing the quantity and speed of data collection of real time travel/traffic data, processing, and transmission to transportation agencies. Further, the TCN Structures may include live video and security feeds to supplement Caltrans' limited number of existing cameras on the freeway and street corridors for public safety. All information received from these additional cameras would only be used for mass traffic data, and no personal or private information would be collected or used. Additionally, the TCN Program would be designed to support future innovations such as autonomous vehicles, smart energy grids, and high-speed wireless cameras.

Roadway Efficiency

The TCN Structures would incorporate real time data collection to aid in traffic signal timing, micro-transit data, and Metro vanpool on-demand services. The TCN Program would also improve bus passengers experience by helping to facilitate transit signal priority, bus wi-fi, and efficiently relay bus timing information to riders. In addition, the TCN Program would support the collection of event congestion data for LAX, Dodger Stadium, the Hollywood Bowl and other large venues, including travel demand management services for the 2028 Olympic and Paralympic Games, and would also provide information regarding available parking spaces in park-and-ride lots.

Public Safety and Communication

The TCN Program would also assist Metro's transportation public messaging and ability to broadcast information to commuters in a variety of ways to increase public safety, maximize efficiency of the congested road network, and promote public awareness of travel alternatives based on geography and time constraints. Further, the TCN Program would be incorporated into the alert information for the freeway messaging system and major arterial network for the region, including Earthquake Early Warning System information as well as Amber Alerts.

Revenue Generation for Transportation Projects

The TCN Program would create advertising revenue that would be utilized by both Metro and the City to fund new and expanded transportation programs. The TCN Structures would follow Metro's Advertising Content Guidelines. Off-site advertising would include information related to a business, commodity, industry or other activity which is sold, offered or conducted elsewhere than on the premises upon which the TCN Structure is located.

3.3.2.2 Zoning Ordinance

The TCN Program is contingent on the adoption of an enabling Zoning Ordinance by the City. The adoption of a Zoning Ordinance includes the drafting of said ordinance, a public hearing, review and recommendation by the City's City Planning Commission, and consideration and adoption by the City Council. The Zoning Ordinance would create a mechanism for the review and approval of the TCN Structures. The Zoning Ordinance would address the time, manner, and place aspects of the TCN Program, including the allowable locations, size and height limitations, urban design requirements, and applicable community benefits including take-down requirements for the removal of existing static off-premise signs.

The vast majority of signs in the City are static displays, including both on-premise or off-premise locations. Further, the Zoning Code does currently allow for digital displays for either on-premise or off premise locations. Codifying modern standards for illumination of the TCN Structures based on current light measuring technology would not drastically change the current illumination allowance, rather it would provide a more definitive measurement based on the most recent technology available. In a similar vein, the adoption of digital display standards for the TCN Structures would create centralized, modern, and uniform standards for the TCN Structures.

3.3.3 Design and Location of TCN Structures

Freeway Facing TCN Structures would include signage that can be viewed from the highway, while Non-Freeway Facing TCN Structures would be viewed from major streets. Each TCN Structure would have one or two faces depending on the location and line of site visibility. The digital display faces of the TCN Structures would use light emitting diodes (LED) lighting with a daytime maximum up to 5,000 maximum candelas and 500 maximum candelas at nighttime. The digital display faces would be designed to provide efficient and effective illumination while minimizing light spill-over, reducing sky-glow, and improving nighttime visibility through glare reduction. Louvers would be installed to shade the LED lights from creating unintentional light spillage, assist in reducing reflection, and in turn would create a sharper image. Further, the digital display faces would be set to refresh every eight seconds and would transition instantly with no motion, moving parts, flashing, or scrolling messages. Illumination of the digital displays would conform to applicable Federal and State Regulations for signs oriented towards roadways and freeways. In addition, each TCN Structure would include security features, including elevated ladders at surface grade. Additionally, the TCN Structures would be constructed to incorporate environmentally sustainable features and construction protocols required by the Los Angeles Green Building Code, CALGreen, and Title 24 standards. Refer to Table 1 and Table 2 on pages 10 and 11 and Figure 1 through Figure 3 on pages 12 through 14, respectively, for a listing of the proposed locations.

Table 1
Freeway Facing TCN Structure Locations

Sign ID	Map No.	Location
FF-01	3	US-101 North Lanes at Union Station
FF-02	3	US-101 South Lanes at Center Street
FF-03	3	US-101 North Lanes at Keller Street
FF-04	3	US-101 South Lanes at Beaudry Street
FF-05	1	US-101 North Lanes, Northwest of Lankershim Boulevard
FF-06	3	I-5 South Lanes at North Avenue 19
FF-07	3	I-5 North Lanes at San Fernando Road
FF-08	3	I-5 South Lanes and Exit Ramp to I-10
FF-09	3	I-10 West Lanes (Bus Yard)
FF-10	3	I-10 West Lanes and Entrance Ramp from I-5
FF-11	3	I-10 East Lanes and Exit Ramp to SR-60 and I-5
FF-12	3	I-10 West Lanes at Griffin Avenue and East 16th Street
FF-13	1	SR-2 South Lanes Northeast of Casitas Avenue
FF-14	1	SR-2 North Lanes Northeast of Casitas Avenue
FF-15	1	SR-170 South Lanes at Raymer Street
FF-16	1	SR-170 North Lanes North of Sherman Way
FF-17	1	I-5 North Lanes South of Tuxford Street
FF-18	1	I-5 South Lanes South of Tuxford Street
FF-19	1	SR-118 East of San Fernando Road
FF-20	1	SR-118 East of San Fernando Road
FF-21	2	I-110 South Lanes at Exposition Boulevard
FF-22	1	I-5 North Lanes at San Fernando Road
FF-23	2	I-110 North Lanes at Exposition Boulevard
FF-24	1	I-5 South Lanes at San Fernando Road and Sepulveda Boulevard
FF-25	1	I-405 South Lanes at Victory Boulevard
FF-26	2	I-405 North Lanes at Exposition Boulevard
FF-27	2	I-405 South Lanes at Exposition Boulevard
FF-28	2	I-10 West at Robertson Boulevard
FF-29	2	SR-90 East at Culver Boulevard
FF-30	2	SR-90 West at Culver Boulevard
FF-31	2	I-105 West Lanes at Aviation Boulevard
FF-32	2	I-105 East Lanes at Aviation Boulevard
FF-33	2	I-110 South Lanes at Slauson Avenue
FF-34	2	I-110 North Lanes at Slauson Avenue

Source: FKA, 2022.

Table 2
Non-Freeway Facing TCN Structure Locations

Sign ID	Map No.	Location
NFF-1	1	Northeast corner of Vermont Avenue and Sunset Boulevard
NFF-2	3	Spring Street Bridge, 326 feet North of Aurora Street
NFF-3	1	Northwest corner of Lankershim Boulevard and Chandler Boulevard
NFF-4	1	Northwest corner of Lankershim Boulevard and Universal Hollywood Drive
NFF-5	1	Southwest corner of Lankershim Boulevard and Universal Hollywood Drive
NFF-6	3	Southwest corner of 4th Street and Hill Street
NFF-7	2	Venice Boulevard, 240 feet West of Robertson Boulevard
NFF-8	3	Southeast corner of Alameda Street and Commercial Street
NFF-9	1	Northeast corner of Van Nuys Boulevard and Orange Line Busline
NFF-10	1	Southeast corner of Sepulveda Boulevard and Erwin Street
NFF-11	2	Southwest of Crenshaw Boulevard, 175 feet South of 67th Street
NFF-12	2	Southeast corner of Crenshaw Boulevard and Exposition Boulevard
NFF-13	3	Southeast corner of East Cesar Chavez Avenue and North Vignes Street
NFF-14	2	Pico Boulevard and Exposition Boulevard, South of rail
NFF-15	2	Pico Boulevard, 445 feet West of Sawtelle Boulevard
NFF-16	3	Southeast corner of South Central Avenue and East 1st Street
NFF-17	2	Century Boulevard, 152 feet West of Aviation Boulevard
NFF-18	2	Southwest Aviation Boulevard and South of Arbor Vitae Street
NFF-19	2	Northwest corner of Vermont Avenue and Beverly Boulevard
NFF-20	2	Southwest corner of Santa Monica Boulevard and Vermont Avenue
NFF-21	3	South of 4th Street 210 feet East of South Santa Fe Avenue
NFF-22	3	Northwest corner of East 7th Street and South Alameda Street

Source: FKA, 2022.

3.3.3.1 Freeway Facing TCN Structures

As shown in Table 1 on page 10, the Project would include up to 34 Freeway Facing TCN Structures with digital display faces that would range in size from 672 square feet to 1200 square feet per sign with the majority being approximately 672 square feet. Additionally, as several of the Freeway Facing Structures are located adjacent to elevated freeways or freeway on/off ramps the Freeway Facing Structures would be located up to 50 feet in height above finished grade of the adjacent highway.

3.3.3.2 Non-Freeway Facing TCN Structures

As shown in Table 2, the Project would include up to 22 Non-Freeway Facing TCN Structures with digital display faces that would range in size from 300 square feet to 672 square feet per sign, with the majority being approximately 300 square feet. Additionally, the Non-Freeway Facing Structures would be located up to 30 feet in height above finished grade.

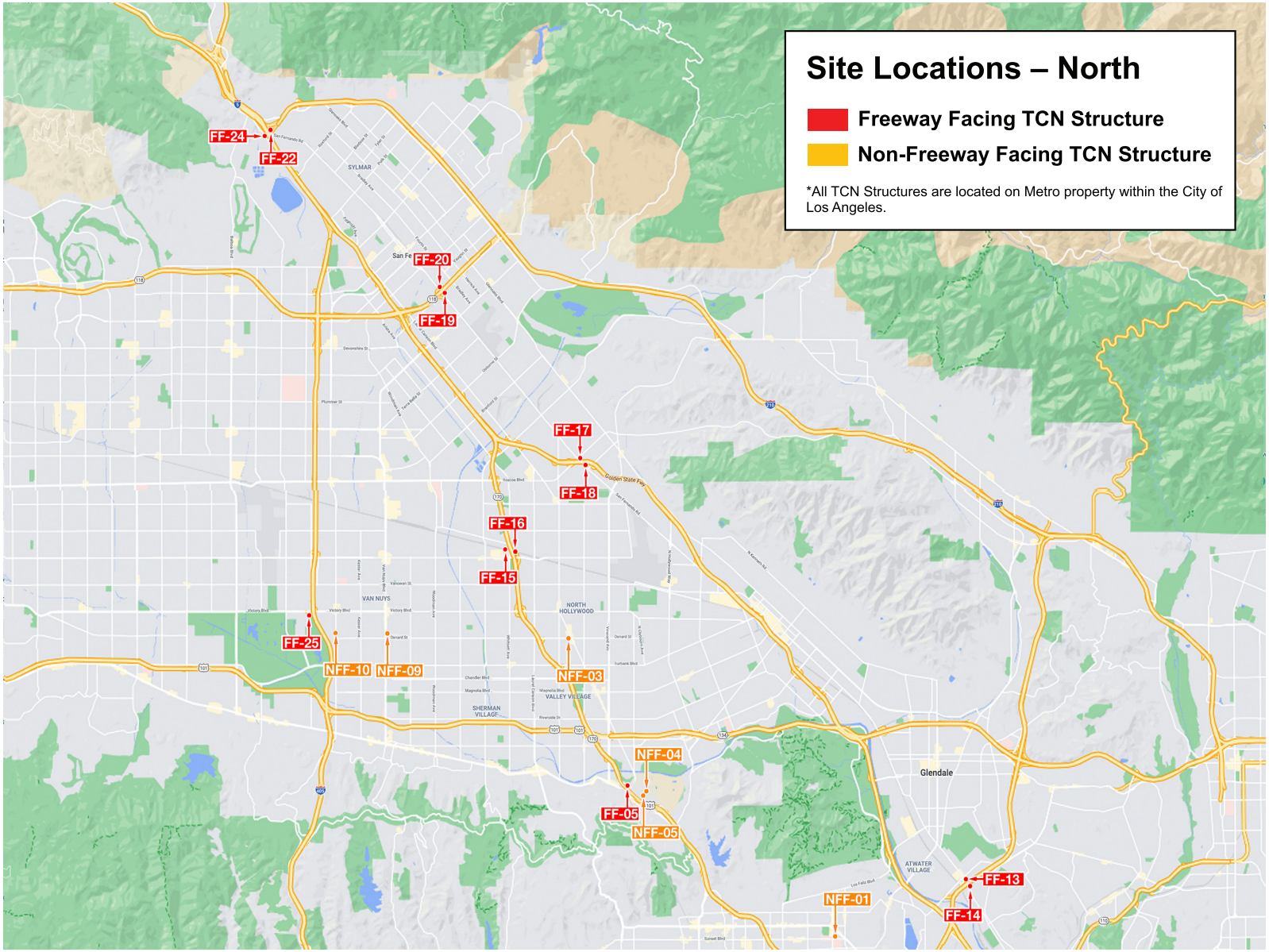

Figure 1

Regional Project Location Map – North

Source: ALLVISION, 2022.

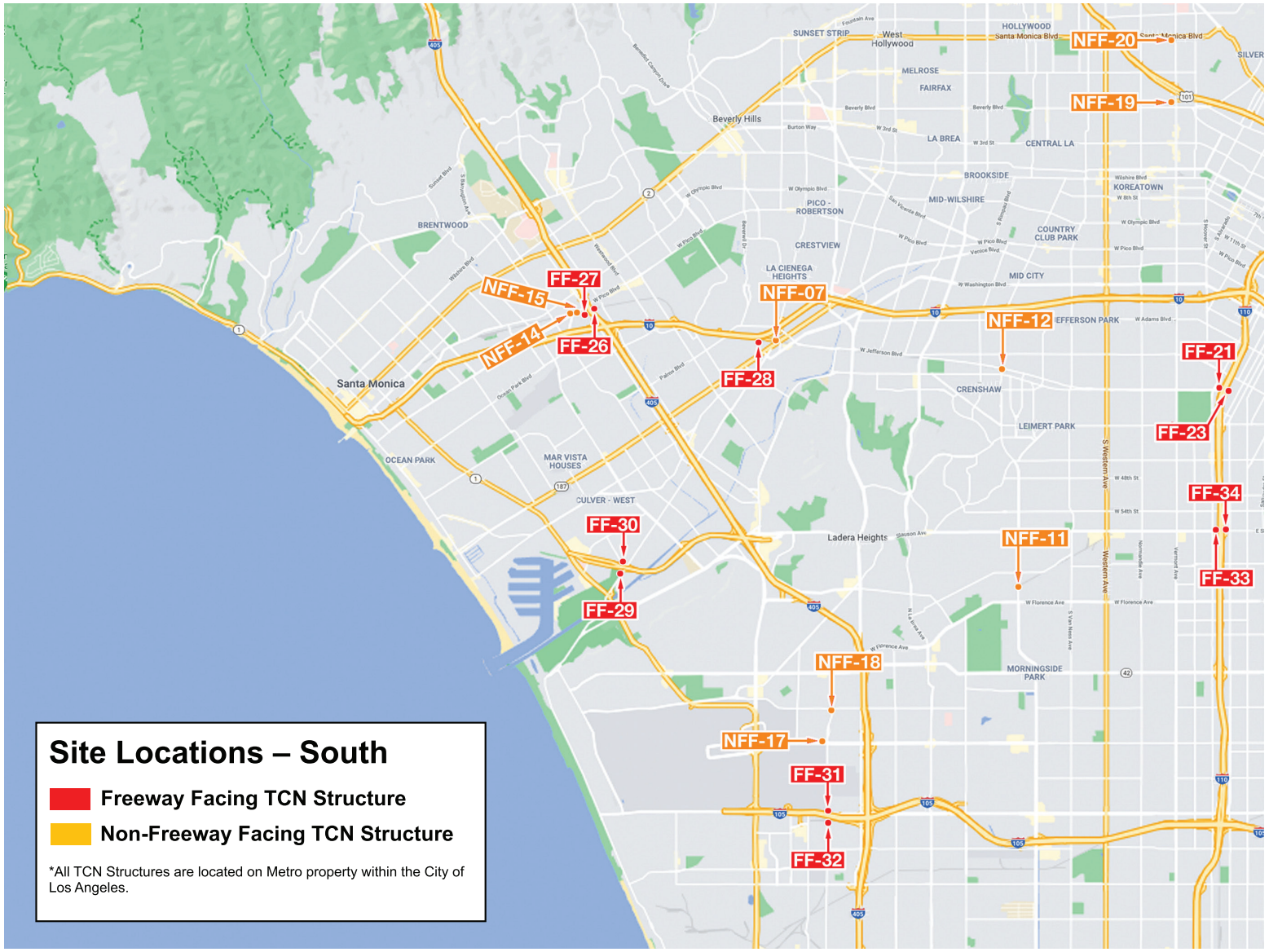

Figure 2

Regional Project Location Map – South

Source: ALLVISION, 2022.

Figure 3

Regional Project Location Map – Downtown

Source: ALLVISION, 2022.

3.3.4 Anticipated Construction Schedule

Construction of the Project would commence with the removal of static displays. The TCN Structures would be constructed on an approximately 10-foot by 10-foot area, depending on soil conditions. Construction would include the use of a drill rig that would drill a hole up to 50 feet in depth and 10-foot by 10-foot in width, depending on soil conditions. A steel column for the Digital Display would be placed with a crane and cast in place with concrete. The digital display face(s) would be assembled at grade and would be lifted by a crane and affixed to the column structure. Further, minor trenching would be required to lay electrical conduit to connect to Los Angeles Department of Water and Power (LADWP).

The TCN Structures are anticipated to be installed in a phased approach, and would take approximately four weeks per sign for installation. Overall, Project construction is anticipated to commence in 2023 and be completed in 2025. It is estimated that approximately 93 cubic yards of soil export would be required per TCN Structure installation for a total of up to approximately 5,185 cubic yards of export.

3.4 REQUESTED PERMITS AND APPROVALS

The Environmental Impact Report will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. Discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

- Adoption of Zoning Ordinance and any other Zoning Code and General and/or Specific Plan amendments to provide for the implementation of the TCN Program.
- Other discretionary and/or ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary lane closure permits, demolition/removal permits, grading permits, and sign approvals.

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☒	☐	☐	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c. 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?	☒	☐	☐	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☒	☐	☐	☐

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

Potentially Significant Impact. A scenic vista is a broad view that includes a visual resource(s). The Site Locations for the TCN Structures are located on property owned and operated by Metro along the rail rights-of-way, freeways, and major streets, within the City of Los Angeles (City). The majority of the Site Locations are located on vacant land with limited vegetation and are generally inaccessible to the public. The Project would involve the construction and operation of TCN Structures and takedown of existing static displays on a variety of locations within the City, which may be visible within scenic vistas of visual resources. Therefore, further evaluation of the Project's potential to result in a substantial adverse effect on a scenic vista will be included in the EIR.

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

Less Than Significant Impact. The Site Locations for the TCN Structures are located within property owned and operated by Metro along freeways, and major streets, within the City. The majority of the Site Locations are located on vacant land with limited vegetation and are generally inaccessible to the public. The Project is not anticipated to result in the removal of any structures or trees or be located within a state scenic highway that may be considered scenic resources. Impacts of the Project would be less than

significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

c. In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (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?

Potentially Significant Impact. The Project would involve construction and operation of TCN Structures and takedown of existing static displays on a variety of urban locations within the City, which are generally zoned and designated as commercial, public facilities, and manufacturing uses. The Project's associated City Zoning Ordinance would establish a mechanism for the review and approval of TCN Structures at defined Metro-owned locations throughout the City, including the Site Locations described herein. The Zoning Ordinance would authorize signage with digital displays, including off-premise advertising, associated with the TCN Structures, and authorization may result in a conflict with applicable zoning or other regulations governing scenic quality. This conflict may necessitate amendments to applicable zoning or General Plan regulations. The potential for the Project to conflict with applicable zoning and other regulations governing scenic quality will be included in the EIR.

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

Potentially Significant Impact. The Project would involve construction and operation of TCN Structures and takedown of existing static displays on a variety of locations on Metro property within the City. The Site Locations for the TCN Structures are used primarily for Metro operations which include rail corridors, stations, parking, bus depots, and equipment lots that already include existing artificial light and glare sources. However, the TCN Structures would create a new source of lighting due to their utilization of digital displays. Therefore, the Project's potential to adversely affect day and nighttime views in the area will be included in the EIR.

II. AGRICULTURE AND FOREST RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The Project is located in urbanized areas of the City. The Site Locations for the TCN Structures are used primarily for Metro operations and are generally zoned and designated as commercial, public facilities, and manufacturing uses. No agricultural uses or operations occur within or in the vicinity of the Site Locations. The Site Locations and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.[23] The Zoning Ordinance associated with the Project would not permit development outside of urbanized areas nor land that is zoned for agriculture or Farmland. As such, the Project would not convert farmland to non-

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2 California Department of Conservation, California Important Farmland Finder, https://maps.conservation.ca.gov/DLRP/CIFF/App/index.html?marker=-118.29152006048791%2C34.02551004278704%2C%2C%2C%2C&markertemplate=%7B%22title%22%3A%22%22%2C%22longitude%22%3A-118.29152006048791%2C%22latitude%22%3A34.02551004278704%2C%22isIncludeShareUrl%22%3Atrue%7D&level=14, accessed February 26, 2022.

3 California Department of Conservation—The Williamson Act Status Report, www.conservation.ca.gov/dlrp/wa/Documents/stats_reports/2020%20WA%20Status%20Report.pdf, accessed February 8, 2022.

agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. As previously discussed, the Site Locations for the TCN Structures are used primarily for Metro operations and are generally zoned as commercial, public facilities, and manufacturing uses. As such, none of the Site Locations are zoned for agricultural use. Furthermore, no agricultural zoning is present in the surrounding area. The Site Locations and surrounding area also are not enrolled under a Williamson Act Contract.[4] The Zoning Ordinance associated with the Project would not permit development outside of urbanized areas nor land that is zoned for agriculture or Farmland. There are no Williamson Act Contracts in the City. Therefore, the Project would not conflict with any existing zoning for agricultural uses or a Williamson Act Contract. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. As previously discussed, the Site Locations for the TCN Structures are in an urbanized area, used primarily for Metro operations, and are generally zoned as commercial, public facilities, and manufacturing uses. The Site Locations do not include any forest land or timberland and are not zoned as forest land or timberland. The Project's associated City Zoning Ordinance would not permit or approve TCN Structures on property zoned for forest land, timberland, or zoned for Timberland Protection. Therefore, the Project would not conflict with existing zoning for, or cause the rezoning of, forest land or timberland. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. As discussed above, the Site Locations for the TCN Structures are located in urbanized areas, used primarily for Metro operations, and do not include forest land. As such, the Project, inclusive of the City's Zoning Ordinance, would not result in the conversion of forest land to non-forest use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

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4 City of Los Angeles Department of City Planning, ZIMAS, http://zimas.lacity.org, accessed February 8, 2022.

No Impact. As described above, the Site Locations for the TCN Structures are located within urbanized areas, used primarily for Metro operations, and do not include farmland or forest land. The Site Locations and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance; are not zoned for farmland, agricultural use, or forest land; and do not contain any agricultural or forest uses.[5] Furthermore, the City's Zoning Ordinance would not permit TCN Structures on land zoned or utilized for farmland, agriculture, or forest uses. As such, the Project would not result in the conversion of farmland to non-agricultural use or forest land to non-forest use. No impacts would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

III. AIR QUALITY

Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☒	☐	☐	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

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

Potentially Significant Impact. The Project is located within the 6,700-square-mile South Coast Air Basin. Within the South Coast Air Basin (Basin), the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [$PM_{2.5}$], and lead[6]). SCAQMD's 2016 Air Quality Management Plan (AQMP) contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the

[5] Partial Nonattainment designation for lead for the Los Angeles County portion of the South Coast Air Basin only.

[6] SCAG serves as the federally designated metropolitan planning organization (MPO) for the Southern California region.

regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment.[7] With regard to future growth, SCAG has prepared their 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG's planning area. Construction of the Project may result in a temporary increase in stationary and mobile source air emissions through construction activities, such as moving dirt and diesel exhaust from construction equipment. Operation of the project is not expected to increase stationary and mobile source air emissions. As a result, although not anticipated based on the size and scope of the Project, the Project could have a temporary potential adverse effect on SCAQMD's implementation of the AQMP. Therefore, further evaluation of the Project's potential conflicts with the AQMP will be included in the EIR.

b. 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?

Potentially Significant Impact. As discussed above, construction and operation of the Project could result in the emission of air pollutants in the Basin, which is currently in non-attainment of federal air quality standards for ozone, $PM_{2.5}$ and lead, and state air quality standards for ozone, particulate matter less than 10 microns in size (PM_{10}), and $PM_{2.5}$. As a result, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact in the Basin.Therefore, further evaluation of the Project's potential cumulative air pollutant emissions will be included in the EIR.

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

Potentially Significant Impact. As discussed above, construction activities associated with the Project may expose sensitive receptors in the City to increased short-term air pollutant emissions during construction from the take down of static displays, as well as construction of the TCN Structures. Sensitive receptors located in the vicinity of the Site Locations may include residential, park, or open space uses. Therefore, further evaluation of the Project's Site Location's potential to result in substantial adverse impacts to sensitive receptors will be included in the EIR.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people. With respect to Project operation, according to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural

[7] SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, www.aqmd.gov/home/rules-compliance/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed January 12, 2022.

uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve operation of these types of uses.

Construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations.[8] In particular, Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.[9]

Based on the above, the Project does not involve operational elements related to land uses that are associated with odor impacts and as such would not result in other emissions, such as those leading to odors. Impacts during construction and operation of the Project would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☒	☐	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☒	☐	☐	☐
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☒	☐	☐	☐

8 SCAQMD, Rule 402, Nuisance, adopted May 7, 1976.

9 City of Los Angeles Department of City Planning, ZIMAS, http://zimas.lacity.org/, accessed February 12, 2022.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☒	☐	☐	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

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

Potentially Significant Impact. The Project would involve construction and operation of TCN Structures and takedown of existing static displays on a variety of locations on Metro property within the City. The Site Locations for the TCN Structures are used primarily for Metro operations which include rail corridors, stations, parking, bus depots, and equipment lots. The majority of the Site Locations are located on vacant land with limited vegetation. However, several of the TCN Structures would be located within the vicinity of sensitive habitats including the Los Angeles River and Ballona Wetlands, which may be habitat for special status species.

Therefore, further evaluation of the Project's potential to result in a substantial adverse effect due to potential light intrusion, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the CDFW or USFWS will be included in the EIR.

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

Potentially Significant Impact. The Site Locations for the TCN Structures are used primarily for Metro operations which include rail corridors, stations, parking, bus depots, and equipment lots. The majority of the Site Locations are located on vacant land with limited vegetation. However, several of the TCN Structures would be located within the vicinity of sensitive habitats including the Los Angeles River and Ballona Wetlands.

Therefore, further evaluation of the Project's potential to result in a substantial adverse effect on any riparian habitat or other sensitive natural community will be included in the EIR.

c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Potentially Significant Impact. The Site Locations for the TCN Structures are used primarily for Metro operations which include rail corridors, stations, parking, bus depots, and equipment lots. The majority of the Site Locations are located on vacant land with limited vegetation. However, several of the TCN Structures would be located within the vicinity of sensitive habitats including the Los Angeles River and Ballona Wetlands.

Therefore, further evaluation of the Project's potential to have an adverse effect on state or federally protected wetlands will be included in the EIR.

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

Potentially Significant Impact. The Site Locations for the TCN Structures are used primarily for Metro operations which include rail corridors, stations, parking, bus depots, and equipment lots. The majority of the Site Locations are located on vacant land, previously developed sites, with limited vegetation. However, several of the TCN Structures would be located within the vicinity of sensitive habitats including the Los Angeles River and Ballona Wetlands.

Therefore, due to the potential for light intrusion, further evaluation of the Project's potential to interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites will be included in the EIR.

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

Less Than Significant Impact. The City of Los Angeles Protected Tree and Shrub Ordinance (Ordinance 186873, LAMC Chapter IV, Article 6) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, California Bay trees, Mexican Elderberry shrubs, and Toyon shrubs of at least four inches in diameter at breast height or four and one-half feet above the ground level at the base of the tree or shrub. These tree and shrub species are defined as "protected" by the City of Los Angeles. Trees or shrubs that have been planted as part of a tree planting program are exempt from the City's Protected Tree and Shrub Ordinance and are not considered protected. The City's Protected Tree and Shrub Ordinance prohibits, without a permit, the removal of any regulated protected tree, including "acts that inflict damage upon root system or other parts of the tree or shrub…" The protected tree or shrub must be replaced within the property by at least four specimens of a protected variety, except where the protected species is relocated pursuant to the LAMC. In addition, a protected tree shall only be replaced by other protected tree varieties and shall not be replaced by shrubs. A protected shrub shall only be replaced by other protected

shrub varieties and shall not be replaced by trees, to the extent feasible as determined by the Advisory Agency, Board of Public Works, or a licensed or certified arborist. The proposed Site Locations do not include any protected trees or shrubs and no trees would be removed. Any trees in the vicinity of the Site Locations would be avoided and preserved in place. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Site Locations for the TCN Structures are used primarily for Metro operations which include rail corridors, stations, parking, bus depots, and equipment lots.

The Natural Community Conservation Act (NCCA) (CFGC Chapter 10, Division 3, Sections 2800 et seq.) was enacted in 1991. The NCCA is administered by CDFW. The goal of this Act is to identify and secure habitat areas for protection of biodiversity. Habitat areas are identified by CDFW, and plans are prepared for habitat protection. When a development project is proposed, a determination is made concerning the potential impacts of the project on biodiversity and the best means of avoiding or mitigating them. NCCA allows local, State or federal agencies to enter into agreements with public and private entities to implement a "natural community conservation plan" (NCCP), e.g., habitat and species protection within a specified geographic area. Participation in an NCCP does not exempt a development project from CEQA. Mitigation measures pursuant to CEQA may, as an alternative, include participation in an NCCP in order to reduce the burden for on-site mitigation.

Habitat Conservation Plans (HCPs), designated under the FESA Section 10(a)(1)(B), are federal planning documents designed to conserve the ecosystems upon which listed species depend, ultimately contributing to their recovery. HCPs require a "take permit" when a project will affect a species identified as listed, non-listed or eligible under the act and detail how those impacts will be minimized or mitigated; and how the HCP is to be funded (USFWS 2020). No HCPs or NCCPs apply to the City (City of Los Angeles 2015a). Therefore, no impact would occur.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☒	☐	☐	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☒	☐	☐	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

Potentially Significant Impact. Section 15064.5 of the CEQA Guidelines generally defines a historical resource as a resource that is: (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to PRC Section 5020.1(k)); or (3) identified as significant in an historical resources survey (meeting the criteria in PRC Section 5024.1(g)). In addition, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register. The local register of historical resources is managed by the Los Angeles Office of Historic Resources, which operates SurveyLA, a comprehensive program to identify significant historical resources throughout the City.

The Project would not result in the removal of any existing buildings. However, the Project would involve construction of TCN Structures on Site Locations where historical resources are present in the general vicinity. Therefore, further evaluation of the Project's potential impacts on historical resources will be included in the EIR.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?

Potentially Significant Impact. CEQA Guidelines Section 15064.5(a)(3)(D) generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Site Locations are located within previously developed areas of the City that have been subject to grading, excavation and fill activities. Therefore, surficial archaeological resources that may have existed at one time have likely been previously disturbed. Nevertheless, the development of the Project would result in excavation depths of up to approximately 50 feet below existing grade which could encounter and potentially disturb archaeological resources. Therefore, further evaluation of the Project's identified Site Location's potential to disturb previously undiscovered archaeological resources will be included in the EIR.

c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. The Site Locations for the TCN Structures are located within urbanized areas of the City that have been subject to previous grading and development. No known traditional burial sites have been identified on the Site Locations. Nevertheless, as the Project would require excavation at depths of up to 50 feet, the potential to uncover existing but undiscovered human remains exists. If human remains are discovered during Project construction, work in the immediate vicinity of the construction area for the TCN Structure would be halted, and the County Coroner, construction manager,

and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e), which requires that work stop near the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e), if the coroner determines the remains to be Native American, the coroner shall contact the Native American Heritage Commission who shall identify the most likely descendent. The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98. Compliance with these regulatory standards would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities, Project impacts related to human remains would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

VI. ENERGY

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

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

Potentially Significant Impact. The Project would generate an increased demand for electricity provided by the Los Angeles Department of Water and Power (LADWP), compared to existing conditions. While development of the Project would not be anticipated to cause wasteful, inefficient, and unnecessary consumption of energy resources, further evaluation of the Project's demand on existing energy resources will be provided in the EIR.

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

Potentially Significant Impact. As previously described, the Site Locations for the TCN Structures are used primarily for Metro operations which include rail corridors, stations, parking, bus depots, and equipment lots. The Site Locations do not include any renewable energy sources used by LADWP. The Project has been designed and would be constructed to incorporate environmentally sustainable features and construction protocols required by the Los Angeles Green Building Code and CALGreen and Title 24 standards.

While the Project would not be anticipated to conflict with or obstruct a state or local plan for renewable energy or energy efficiency, further evaluation of the Project's potential to conflict or obstruct state or local renewable energy or energy efficiency plans would be analyzed, including compliance with LADWP's plans for renewable energy, as well as the Project's compliance with California Building Energy Efficiency Standards, will be included in the EIR.

VII. GEOLOGY AND SOILS

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

a. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Potentially Significant Impact. The California Geological Survey (CGS) establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 feet to 500 feet on each side of a known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City designates Fault Rupture Study Areas alongside active and potentially active faults to establish areas of potential hazard due to fault rupture. Based on City data, several of the Site Locations for the TCN Structures are located within a City designated Fault Rupture Study Area or an Alquist-Priolo Earthquake Fault Zone as mapped by CGS.[10] Thus, further evaluation in regard to the potential hazard of fault rupture will be provided in the EIR.

ii. Strong seismic ground shaking?

Potentially Significant Impact. The Site Locations for the TCN Structures are located within the seismically active Southern California region and, in particular, within a few miles of several active faults and fault systems, including the Puente Hills Blind Thrust, Newport-Inglewood Fault Zone, the Santa Monica Fault, Verdugo, Northridge, Santa Susana, Upper Elysian Park, and the Hollywood Fault. As such, the Site Locations could be subject to periodic seismic ground shaking, including events of a notable magnitude. Thus, an analysis of potential seismic ground shaking impacts associated with the Project's Site Locations will be included in the EIR.

iii. Seismic-related ground failure, including liquefaction?

Potentially Significant Impact. The Project does not include a land use development with occupants (e.g., residential or commercial developments). However, several of the Site Locations for the TCN Structures have been mapped as susceptible to liquefaction and seismically induced landslides. Thus, the EIR will address the potential for impacts associated with seismic-related ground failure, including liquefaction, to occur within the Site Locations.

iv. Landslides?

Potentially Significant Impact. The Project does not include a land use development with occupants (e.g., residential or commercial developments). However, several of the Site Locations have been

[10] City of Los Angeles General Plan Safety Element, November 1996, Exhibit C, Landslide Inventory & Hillside Areas, p. 51.

mapped as susceptible to landslides.[11] Thus, the EIR will address the potential for impacts associated with landslides to occur on-site at the defined Site Locations.

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

Potentially Significant Impact. Development of the Project's Site Locations would require grading, excavation, and other construction activities, including on slopes, that have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. Thus, potential impacts associated with soil erosion and loss of topsoil at each Site Location will be addressed in the EIR.

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

Potentially Significant Impact. As discussed above, the Site Locations for the TCN Structures are susceptible to ground shaking and thus the potential for lateral spreading may be present. As such, further evaluation of geologic stability of the defined Site Locations will be provided in the EIR.

d. Would the project be located on expansive soil, as defined in Table 181B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Potentially Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. The Site Locations for the TCN Structures may contain soils that are considered to have a moderate to high expansive potential. Therefore, further evaluation of expansive soils will be provided for the defined Site Locations in the EIR.

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

No Impact. The Project would not require the disposal of wastewater and therefore, would not require the use of septic tanks or alternative wastewater disposal systems. Thus, the Project would have no impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems. No mitigation measures are required and no further evaluation of this topic in an EIR is required.

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

Potentially Significant Impact. No unique geologic features are located within the Site Locations. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. Although the Site Locations for the TCN Structures

[11] City of Los Angeles General Plan Safety Element, November 1996, Exhibit F, 100-Year & 500-Year Flood Plains, p. 57.

have been previously disturbed, the construction of the TCN Structures would require excavation up to a depth of approximately 50 feet, and involve other construction activities that could have the potential to disturb existing but undiscovered paleontological resources. Therefore, further evaluation of the Project's potential impacts to paleontological resources at the defined Site Locations will be provided in the EIR.

VIII. GREENHOUSE GAS EMISSIONS

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

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

Potentially Significant Impact. Gases that trap heat in the atmosphere are called greenhouse gases (GHGs) since they have effects that are analogous to the way in which a greenhouse retains heat. Greenhouse gases are emitted by both natural processes and human activities. The accumulation of greenhouse gases in the atmosphere affects the earth's temperature. The State of California has undertaken initiatives designed to address the effects of GHG emissions, and to establish targets and emission reduction strategies for greenhouse gas emissions in California. Construction and operation of the TCN Structures will produce GHG emissions. Whether those GHG emissions would result in a significant impact will be studied in the EIR.

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

Potentially Significant Impact. Project construction and operation, as well as the adoption of the City's Zoning Ordinance which would permit TCN Structures with digital displays in defined Metro-owned locations, would result in some GHG emissions. The EIR will analyze whether the Project's GHG emissions conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☒	☐	☐	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☒	☐	☐	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	☒	☐	☐	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

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

Less Than Significant Impact.

Construction

During construction of the Project, including take down of existing static displays and installation of the TCN Structures, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and cleaners could be routinely used. While some hazardous

materials used during construction could require disposal, such activity would occur only during the construction activities and would cease upon installation of the TCN Structure. In addition, all potentially hazardous materials to be used during construction would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. Construction of the Project would also comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials. The transport, use, and storage of hazardous materials during future construction would be required to comply with all applicable State and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and California Code of Regulations Title 22. Consequently, Project construction activities would not create a significant hazard to the public or the environment through the use of hazardous materials during construction. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant, and no mitigation measures are required.

Operation

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used for maintenance of TCN Structures, including cleaning products. Such use would be consistent with that currently occurring within the vicinity of the Site Locations. In addition, all hazardous materials used at the Site Locations during operation would be used, stored, and disposed of in accordance with all applicable federal, state and local requirements. Therefore, with compliance with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts associated with the routine transport, use, or disposal of hazardous materials during operation of the Project would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Potentially Significant Impact. The Project would involve construction of TCN Structures and takedown of existing static displays on a variety of locations on Metro property within the City. As discussed in Section 2, Project Description, of this Initial Study, the Site Locations for the TCN Structures are used primarily for Metro operations which include rail corridors, stations, parking, bus depots, and equipment lots. As such, based on the existing and historical uses on the sites adjacent to the Site Locations, lead and other recognized environmental conditions may be present on site. Therefore, further evaluation will be included in the EIR to determine the Project's potential impacts with respect to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

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

Potentially Significant Impact. The Project would involve construction of TCN Structures and takedown of existing static displays on a variety of locations on Metro property within the City. The nearest school to the Site Locations is California Creative Learning Academy, located approximately 0.1-mile north of a Site Location for a TCN Structure. As discussed above, hazardous materials used in connection with construction and operation of a TCN Structure would be limited and such use would occur in accordance with manufacturers specifications and regulatory requirements. In addition, the Project would not involve

the use or handling of acutely hazardous materials, substances, or waste. However, based on the existing and historical uses on the sites adjacent to a portion of the Site Locations, lead and other recognized environmental conditions may be present on site. Therefore, further evaluation will be included in the EIR to determine the Project's potential impacts with respect to an inadvertent release within one-quarter mile of a school from existing hazardous materials during demolition, excavation or grading activities.

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

Potentially Significant Impact. The Project would involve the construction of TCN Structures and takedown of existing static displays on a variety of locations on Metro property within the City. The Site Locations for the TCN Structures may appear on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, further evaluation of this issue will be included in the EIR.

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

Less Than Significant Impact. The Project would involve construction of TCN Structures and takedown of existing static displays on a variety of locations on Metro property within the City, some of which would be within the vicinity of the Los Angeles International Airport (LAX), Santa Monica Airport, Hollywood Burbank Airport, and Whiteman Airport. However, the Project does not include any occupiable structures that would result in the permanent exposure of people to a safety hazard related to proximity to an airport. While construction workers may be exposed to intermittent airport-related noise for those Site Locations within two miles of an airport, such noise levels would be intermittent and limited to the short duration of construction activities. Impacts would be less than significant and no mitigation measures or further analysis are required.

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

Less Than Significant Impact. The City of Los Angeles Emergency Management Department (EMD) is comprised of four divisions and two units: the administrative services division, communications division, community emergency management division, operations division, planning unit, and training exercise unit. EMD partners with City departments, municipalities, and local organizations to provide resources and information to help residents prepare for, respond to, and recover from disasters. Within the EMD, the Emergency Operations Organization (EOO) is the operational department responsible for the City's emergency preparation, response, and recovery operations, while the Emergency Operation Center (EOC) is responsible for coordination of these efforts (EMD 2020). The City's General Plan Safety Element, Exhibit H, currently identifies the major disaster routes within the City (City of Los Angeles 1996). In addition, the County of Los Angeles Department of Public Works has prepared maps of freeway and local disaster routes (County of Los Angeles 2008). These routes typically parallel major north-south and east-west corridors and include freeways such as Interstate 405, U.S. 101, Interstate 710, Interstate 10 (County of Los Angeles 2008).

The Project would involve construction of TCN Structures and takedown of existing static displays on a variety of locations on Metro property within the City, and would therefore be located near several disaster routes designated by the City's Safety Element. While it is expected that the majority of construction activities for the Project would be confined to the immediate vicinity of the Site Locations, limited offsite construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. Therefore, construction activities can potentially interfere with adopted emergency response or evacuation plans as a result of temporary construction activities within rights-of-way, due to temporary construction barricades or other obstructions that could impede emergency access. However, project development construction would not result in interference with adopted emergency response or evacuation plans because temporary construction barricades or other obstructions that could impede emergency access would be subject to the City's permitting process, which requires a traffic control plan subject to City review and approval. Development and implementation of these plans for all construction activity would minimize potential impacts associated with the impairment or physically interference with adopted emergency response or evacuation procedures.

If lane closures are necessary, both directions of travel would continue to be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. With regard to operation, the Project would not require the permanent closure of any local public or private streets and would not impede emergency vehicle access to the Site Locations or surrounding area as set forth in California Vehicle Code (CVC) 21806(a)(1). Therefore, with compliance with applicable regulatory requirements, the Project would not impede emergency access within the Site Locations or vicinity that could cause an impediment along City designated disaster routes such that the Project would impair the implementation of the City's emergency response plan. Furthermore, one of the primary benefits of the TCN Program is to enhance communication during emergency events through utilization of the digital displays on each TCN Structure. As such, the Project's impact related to the implementation of the City's emergency response plan would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The proposed TCN structures are located in urbanized areas. In addition, the Project would not involve the construction of occupiable structures or attract people to the areas of improvement. No impacts with regard to exposing people or structures to significant risks as a result of wildland fires would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. impede or redirect flood flows?	☐	☐	☒	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

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

Less Than Significant Impact. As discussed in Section 2, Project Description, of this Initial Study, the TCN Structures would be constructed on an approximately 10-foot by 10-foot area, depending on soil conditions. Construction would include the use of a drill rig that would drill a hole up to 50 feet in depth and 10-foot by 10-foot in width, depending on soil conditions. A steel column for the Digital Display would be placed with a crane and cast in place with concrete. The Digital Display face(s) would be assembled at grade and would be lifted by a crane and affixed to the column structure. Further, minor trenching would be required to lay electrical conduit to connect to Los Angeles Department of Water and Power

(LADWP). It is estimated that approximately 93 cubic yards of soil export would be required per construction of each TCN Structure, for a total of approximately 5,185 cubic yards of export for construction of up to 56 TCN Structures.

Surface Water Quality

Construction

During Project construction, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, during construction, onsite watering activities may occur to reduce airborne dust which could contribute to pollutant loading in runoff. As part of the Project, Best Management Practices (BMPs) would be implemented to control stormwater runoff and address pollutants during construction. In addition, Project construction activities would occur in accordance with the Los Angeles County Department of Public Works Construction Site BMP Manual, LADBS Guidelines for Stormwater Infiltration, County of Los Angeles LID Requirements and Standard Plan S-480-0, and City grading permit regulations (Chapter IX, Division 70 of the LAMC). These BMPs and regulatory requirements would include erosion control measures, and other measures to ensure that pollutants and sediments are not conveyed into the storm drain system. Construction of each TCN Structure would include the use of a drill rig that would drill a hole up to 50 feet in depth and approximately 10 feet by 10 feet in width. Historical groundwater levels vary according to the location of each TCN Structure. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable regulations and requirements related to construction and discharges from dewatering operations pursuant to the LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, LARWQCB Order No. R4-2018-0125 ("Dewatering Permit"). With the implementation of regulatory compliance requirements including BMPs, the Project would not result in the discharge of potential pollutants into stormwater runoff for all Site Locations including those adjacent to the LA River and Ballona Wetlands. Therefore, construction of the Project would not result in discharge that would violate any water quality standard or waste discharge requirements or otherwise substantially degrade surface water quality . Thus, temporary construction-related impacts on surface water quality would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

Operation

The Site Locations for the TCN Structures are located within the Ballona Creek Watershed, Los Angeles River Watershed, and Santa Monica Bay Watershed. The Project includes the construction of TCN Structures and does not include any uses that would generate any wastewater or pollutants during operation. As such, impacts with regard to water quality standards, waste discharge requirements, or the substantial degradation of surface quality during Project operation would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

Ground Water Quality

Construction

As discussed above, historical groundwater levels vary according to the Site Location of each TCN Structure and the Site Locations may be located in the vicinity of groundwater wells. As discussed above, if groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable regulations and requirements related to construction and discharges from dewatering operations pursuant to the LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, LARWQCB Order No. R4-2018-0125 ("Dewatering Permit"). In addition, during construction, hazardous materials, such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and cleaners could be used. Such use would occur in accordance with manufacturers' specifications and instructions and regulatory requirements. As such, construction of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirement associated with groundwater protection for all Site Locations including those adjacent to the LA River and Ballona Wetlands. Therefore, construction-related impacts on groundwater quality would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

Operation

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used for maintenance of TCN Structures, including cleaning products, and paints. All hazardous materials used at the Site Locations during operation would be used in accordance with manufacturers specifications and regulatory requirements. Therefore, Project operations would not violate any water quality standards or waste discharge requirements with respect to groundwater or otherwise substantially degrade ground water quality. The Project's potential impact on groundwater quality during operation would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact.

Construction

As described above, some of the TCN Structures would be located near groundwater wells, which are found throughout the City. However, as discussed above, if groundwater is encountered during construction, temporary dewatering would occur in accordance with regulatory requirements. Furthermore, due to the limited size of the holes that would be drilled together with the temporary nature of any dewatering, the Project would not substantially impact groundwater supplies or groundwater recharge. Therefore, the Project's temporary construction activities would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basins for all Site Locations including those adjacent to the LA River and Ballona Wetlands. Impacts on groundwater supplies during construction of the

Project would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

Operation

As previously discussed, the Project proposes the construction of up to 56 TCN Structures that would each be constructed on an approximately 10-foot by 10-foot area. As such, the amount of impervious area created would be minimal. Furthermore, the Project would not include the installation of water supply wells. Therefore, Project operations would not decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basins. Impacts would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

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

i. Result in substantial erosion or siltation on or offsite;

Less Than Significant Impact.

Construction

Each TCN Structure would be constructed on an approximately 10-foot by 10-foot area, and would not be located within a stream or river. In addition, as discussed above, grading and trenching activities associated with construction of the TCN Structures would be limited to approximately 93 cubic yards of export per TCN Structure, for a total of approximately 5,185 cubic yards of export for construction of up to 56 TCN Structures. As discussed above, during construction, the Project would implement BMPs and erosion control measures in accordance with regulatory requirements for all Site Locations including those adjacent to the LA River and Ballona Wetlands. Thus, construction activities would not substantially alter drainage patterns in a manner that would result in substantial erosion or siltation. As such, construction-related impacts to erosion and siltation would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

Operation

As previously discussed, the TCN Structures would be constructed on a 10-foot by 10-foot area. As such, the impervious area created by the TCN Structures would be minimal and would not alter existing drainage patterns in the area such that substantial erosion or siltation would occur. Operational impacts to erosion and siltation would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite;

Less Than Significant Impact.

Construction

As indicated above, the proposed construction area would be limited in size and the Project would implement BMPs that would control runoff. Thus, construction activities for the Project would not substantially alter drainage patterns in a manner that would result in increased runoff or flooding on- or offsite. As such, construction-related impacts associated with flooding from surface runoff would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

Operation

As previously discussed, the TCN Structures would be constructed on a 10-foot by 10-foot area. As such, the additional impervious area that would be created would be minimal and would not result in an increase in surface runoff that would result in flooding. Operational impacts associated with flooding from surface runoff would be less than significant and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less Than Significant Impact. During construction, BMPs would be implemented in accordance with regulatory requirements to control stormwater runoff, sediments and sources of pollutants for all Site Locations including those adjacent to the LA River and Ballona Wetlands. In addition, the additional impervious area created for the TCN structures would be minimal and operation of the TCN Structures would not generate runoff or substantial sources of polluted runoff. Impacts with regard to runoff water as it relates to stormwater drainage systems or polluted runoff would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

iv. Impede or redirect flood flows?

Less Than Significant Impact. The TCN Structures would be constructed on a 10-foot by 10-foot area which would not result in an impervious area that would be large enough to substantially impede, alter or redirect flood flows. Thus, impacts with regard to the substantial alteration of existing drainage patterns would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The Project would involve construction of TCN Structures and takedown of existing static displays on a variety of locations on Metro property within the City, some of which would

be within flood hazard and tsunami zones as mapped by the City.[12,13] During construction, hazardous materials, such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and cleaners could be used. Such use would occur in accordance with manufacturers' specifications and instructions and regulatory requirements. As discussed above, any hazardous materials associated with operation of the TCN Structures would be limited to those required to maintain the structures such as cleaning products and paints. These substances would be used in accordance with manufacturers specifications and regulatory requirements and these substances would not be stored at the Site Locations. Therefore, the Project would not risk release of pollutants due to project inundation. Impacts with regard to the release of pollutants due to project inundation would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. As discussed above, during construction, the implementation of BMPs and erosion control measures in accordance with regulatory requirements would target any pollutants that could potentially be carried in stormwater runoff. Furthermore, any hazardous materials used during construction and operation (for maintenance) would be used in accordance with manufacturer's specifications and regulatory requirements. In addition, as also discussed above, the maximum depth of 50 feet together with the small diameter of the hole required for the TCN Structure would not be of a size that would substantially impact groundwater and in the event dewatering is required such dewatering would occur in accordance with regulatory requirements. As such, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Impacts with regard to a water quality control plan or a sustainable groundwater management plan would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

XI. LAND USE AND PLANNING

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

[12] City of Los Angeles General Plan Safety Element, November 1996, Exhibit G, Inundation and Tsunami Hazard Areas, p. 59.

[13] City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.

a. Would the project physically divide an established community?

No Impact. The Project would involve construction of TCN Structures and takedown of existing static displays on a variety of locations on Metro property within the City. The TCN Structures would be constructed on a 10-foot by 10-foot area, and therefore, the area of disturbance for each TCN Structure would be minimal. In addition, the Project does not include buildings or large infrastructure improvements (such as a freeway) that could divide the existing surrounding community. As such, the Project would not physically divide an established community. No impacts related to the physical division of an established community would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Potentially Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project involves the adoption of a Zoning Ordinance permitting the approval and construction of the TCN Structures at specific Metro-owned Site Locations. This Zoning Ordinance would create a mechanism for the review and approval of each Site Location as well as imposing certain requirements related to the operation of the TCN Structure and its digital displays, and would be applicable on a Citywide basis. The Project could potentially conflict with land use plans, policies or regulations that were adopted for the purpose of avoiding or mitigating an environmental effect, particularly in relation to its inclusion of digital off-premise signage and its potential impacts on aesthetics, transportation, and historic resources. Therefore, further evaluation of this topic in an EIR is required.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☒	☐
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☒	☐

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Less Than Significant Impact. Some of the Site Locations are mapped within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, a mineral producing area as

classified by the California Geological Survey, and a City-designated oil field or oil drilling area.[14,15,16] However, no mineral extraction operations currently occur at the Site Locations for the TCN Structures, nor are any such operations proposed as part of the Project. In addition, the TCN Structures would be constructed on a 10-foot by 10-foot area located adjacent to already developed roadways and the Zoning Ordinance enabling the review and approval of Site Locations for TCN Structures would further limit the locations for development. As such, the Project would not result in the loss of availability of mineral resources. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Less Than Significant Impact. See Response to Checklist Question No. XII.a, Mineral Resources, above. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

[14] State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2012.

[15] City of Los Angeles, Conservation Element of the Los Angeles City General Plan, January 2001, Exhibit A, p. 86.

[16] Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples include sand and concrete.

a. 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 in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Impact. During Project construction at the defined Site Locations, the use of heavy equipment (e.g., a drill rig, bulldozers, backhoes, cranes, loaders, etc.) would generate an increase in ambient noise on a short-term basis. Therefore, further evaluation of this topic will be provided in the EIR.

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Construction of the Project at the defined Site Locations could generate groundborne noise and vibration associated with excavation, drilling, and construction truck travel. As such, the Project would have the potential to generate excessive groundborne vibration and noise levels during short-term construction activities. Therefore, further evaluation of this topic will be provided in the EIR.

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Less Than Significant Impact. As discussed in Response to Question No. IX.e, above, the Project would involve construction of TCN Structures and takedown of existing static displays on a variety of locations on Metro property within the City, some of which would be within the vicinity of LAX, Santa Monica Airport, Hollywood Burbank Airport, and Whiteman Airport. However, the Project does not include any occupiable structures that would result in the permanent exposure of people to a safety hazard related to proximity to an airport. While construction workers may be exposed to intermittent airport-related noise for those Site Locations within two miles of an airport, such noise levels would be intermittent and limited to the short duration of construction activities. Impacts would be less than significant and no mitigation measures are required. No further analysis is required.

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

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

Less Than Significant Impact.

Construction

While construction of the Project would create temporary construction-related jobs, the construction workers would likely be hired from the large, highly mobile regional construction work force already living and working within the Los Angeles metropolitan region that moves from project to project. The work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Typically, construction workers pass through various development projects on an intermittent basis as their particular trades are required. Given the short duration of the work for construction of each TCN Structure and takedown of an existing static display, and the large size and mobility of the construction labor pool that can be drawn upon in the region, construction workers would not be expected to relocate their residences within this region or move from other regions into this region in response to the short-term Project-related construction employment opportunities and, therefore, no new permanent residents would be generated during construction of the Project.

Operation

As previously discussed, the Project does not propose the development of residential uses that would generate residential population growth or other uses that would generate new permanent employees. While the TCN Program could result in additional employees associated with operation of the Project, the additional employees would not be substantial in number and would likely already live in the region. As such, Project operation would not induce substantial unplanned population growth.

Based on the above, the Project would not induce substantial unplanned population or housing growth. Impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. No housing or other occupiable structures currently exist at the Site Locations. As such, the Project would not displace any existing persons or housing or require the construction of replacement housing elsewhere. No impacts would occur with regard to the displacement of substantial numbers of existing people or housing and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

XV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the

construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☒	☐

a. through e. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services, police protection services, schools, parks or other public facilities?

Less Than Significant Impact.

Construction

Due to the small size of the construction areas and limited duration of construction activities, construction of the Project would generate minimal demand for police and fire protection services. In addition, construction workers would not be expected to relocate their residences within this region or move from other regions into this region and thus would not generate a demand for additional schools, parks or libraries. Therefore, construction of the Project would not result in a demand for new fire facilities, police facilities, schools, parks, or other public facilities such as libraries, the construction of which could cause significant impacts. No further analysis of this topic in the EIR is required.

Operation

As previously discussed, the Project does not propose the development of residential uses that would generate residential population growth or other uses that would generate new permanent employees. While the TCN Program could result in additional employees associated with operation of the Program, the additional employees would not be substantial in number and would likely already live in the region. Therefore, operation of the Project would not result in the demand for new fire facilities, police facilities, schools, parks, or other public facilities such as libraries, the construction of which could cause significant impacts. Thus, the Project would not result in impacts associated with public facilities. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

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

No Impact. As discussed in the Response to Checklist Question XV(a) above, the Project does not propose the development of residential uses, which would create a demand on nearby parks or recreational facilities. Additionally, the Project would not result in a substantial increase in new employees within the region. Therefore, the Project would not substantially increase the demand for offsite public parks and recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. No impact to parks and recreational facilities would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. The Project does not include recreational facilities. In addition, the Project does not include any residential uses that would result in the increased use of existing recreational facilities. As such, the Project would not necessitate construction of new recreational facilities. Therefore, no impact with regard to the construction or expansion of recreational facilities would occur, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☒	☐	☐	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	☐	☒
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☒	☐	☐	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

a. Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Potentially Significant Impact. As previously discussed, the Project would involve construction of TCN Structures and takedown of existing static displays on a variety of locations on Metro property within the City. Furthermore, the Project would entail the adoption of a Zoning Ordinance permitting the review and approval of the Site Locations for TCN Structures as well as regulating its operations. The TCN Structures involve the usage of digital displays and would allow for the off-premise advertising. The Project could conflict with an applicable plan, ordinance or policy addressing the circulation system with regard to signage adjacent to major roadways and freeways. Therefore, further evaluation of this issue will be provided in the EIR.

b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

No Impact. In accordance with SB 743 and the updates to the CEQA Guidelines, the focus of transportation analysis has shifted from driver delay to vehicle miles traveled (VMT). Operation of the Project would not result in new uses that would generate vehicle miles traveled on a daily basis. Any vehicle trips and associated VMT resulting from maintenance activities would be infrequent. Additionally, in accordance with LADOT's Transportation Assessment Guidelines (TAG), construction worker trips are not evaluated under CEQA. As such, the Project would not result in significant impacts with regard to VMT, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Potentially Significant Impact. As previously discussed, the Project would involve construction of TCN Structures and takedown of existing static displays on a variety of locations on Metro property within the City. Furthermore, the Project would entail the adoption of a Zoning Ordinance permitting the review and approval of the Site Locations for TCN Structures as well as regulating its operations. The TCN Structures involve the usage of digital displays and will allow for the off-premise advertising adjacent to freeways and major roads. While the Zoning Ordinance regulations are intended to address any safety issues posed by the TCN Structures to drivers and other users of the right of way, impacts will be analyzed in the EIR.

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. The Project would involve construction of TCN Structures and takedown of existing static displays on a variety of locations on Metro property within the City. While it is expected that the majority of construction activities for the Project would be confined to the Site Locations, limited offsite construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. With regard to operation, the Project would not alter the existing traffic patterns as described in Section IX.f Hazards and Hazardous Materials above. Furthermore, one of the primary benefits of the TCN Program is to provide communication to travelers during emergency events. Therefore, the Project would not result in inadequate emergency access to the Site Locations or surrounding uses. Impacts regarding emergency access would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☒	☐	☐	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☒	☐	☐	☐

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Potentially Significant Impact (Checklist Questions XVIII.a. and b.). The Site Locations are in urbanized areas and have been previously graded. Nonetheless, as noted above, the development of Project's Site Locations would require excavations up to approximately 50 feet deep, which could have the potential to disturb existing but undiscovered tribal cultural resources. Therefore, the potential exists for the Project to impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe.

Further evaluation of this topic will be provided in the EIR.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☒	☐	☐	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

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

Potentially Significant Impact—Electrical Facilities; Less Than Significant Impact—Water, Wastewater Treatment, Stormwater Drainage, Natural Gas and Telecommunications.

Electrical Facilities

Electrical service to the Site Locations for the proposed TCN Structures would be provided by LADWP. This service is expected to be provided by existing electrical infrastructure in the vicinity of each Site Location through a network of utility poles and underground utility lines. Furthermore, the TCN Structures incorporate digital display technology for visual displays of varying sizes. Thus, this topic will be further addressed in the EIR.

Water, Wastewater Treatment, Stormwater Drainage, Natural Gas and Telecommunications

The Project would involve limited use of water during construction and operation (associated with maintenance) and would not generate wastewater. As discussed above, the Project would not be of a size or type that would generate the demand for substantial stormwater drainage infrastructure improvements. Furthermore, construction and operation of the Project would not utilize natural gas and thus would not generate a demand for new natural gas infrastructure. Finally, construction and operation of the Project would not result in the demand for substantial telecommunications infrastructure improvements. Therefore, the Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, natural gas or telecommunication facilities the construction or relocation of which could cause significant environmental effects. No mitigation measures would be required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. LADWP provides water service within the City of Los Angeles. The Project would have a minimal demand for water during construction and during operation (related to maintenance). Therefore, the Project would not result in impacts associated with water supply, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

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

No Impact. LA Sanitation & Environment (LASAN) provides sewer service within the City of Los Angeles. The Project would not generate wastewater during construction or operation. Therefore, the Project would not result in impacts to wastewater treatment capacity, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. Landfills within Los Angeles County are categorized as either Class III (e.g., landfills permitted to accept non-hazardous and non-designated solid waste) or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste, such as construction waste, yard trimmings, and earth-like waste, is disposed of in inert waste landfills.[17] Ten Class III landfills and one inert landfill are currently operating within the County.[18] Based on the 2019 Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the most recent report available, the estimated remaining capacity for the County's Class III landfills open to the City of Los Angeles is approximately 133.07 million tons as of December 31, 2019.[19] In addition, the 2019 CoIWMP Annual Report estimates that the estimated remaining capacity for the Azusa Land Reclamation landfill, the permitted inert waste landfill serving the County, is 58.84 million tons, as of December 31, 2019.[20] Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the CoIWMP Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.

Construction

The project would generate a minimal amount of construction waste which would be accommodated within the Azusa Land Reclamation Landfill's remaining disposal capacity of 58.84 million tons. Additionally, soil export is not included in the calculation of construction waste since soil is not disposed of as waste but, rather, is typically used as a cover material or fill at other construction sites requiring soils

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17 County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020. The ten Class III landfills serving the County include the Antelope Valley Landfill, Burbank Landfill, Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebbly Beach Landfill, San Clemente Landfill, Whittier (Savage Canyon) Landfill, Scholl Canyon Landfill, and Sunshine Canyon City/County Landfill. Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

18 County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020, Appendix E-2 Table 4. This total excludes Class III landfills not open to the City of Los Angeles for disposal (i.e., Scholl Canyon, Whittier, Burbank, Pebbly Beach, and San Clemente). In addition, this total excludes the Calabasas Landfill, as its wasteshed does not include the locations for the TCN structures.

19 County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020, Appendix E-2 Table 4.

20 County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020.

import. Based on the above, Project construction would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, the Project's potential construction impacts to solid waste facilities would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

Operation

As discussed above in Checklist Question No. XIV, Population and Housing, the Project would not generate on-site employees or residents. As such, Project operation would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, no impacts to solid waste facilities would occur as a result of operation of the Project and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. The Project would comply with applicable waste diversion requirements during construction. As operation of the Project would not generate solid waste, there are no regulations that would be implemented. As such, the Project's potential impacts associated with compliance with solid waste regulations would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

XX. WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The Project would not impede public access to emergency/disaster routes and would not interfere with an adopted emergency response plan or emergency evacuation plan, including the Los Angeles County Operational Area Emergency Response Plan. While it is expected that the majority of construction activities for the Project would be confined to the Site Locations, limited offsite construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, both directions of travel would continue to be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. With regard to operation, the Project would not require the permanent closure of any local public or private streets and would not impede emergency vehicle access to the Site Locations or surrounding area as set forth in California Vehicle Code (CVC) 21806(a)(1). No impacts with regard to an adopted emergency response plan or emergency evacuation plan would occur, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

b. Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. The Project does not include a land use development with occupants (e.g., residents, employees or visitors). Thus, there is no potential for the Proposed Project to expose people to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire. No impacts with regard to the exacerbation of wildfire risks would occur, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

c. Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Less than Significant Impact. The majority of the Site Locations are located on vacant land with limited vegetation and are generally inaccessible to the public. The Project would require the installation of conduit lines to connect to LADWP provided electricity, which would be installed underground. Therefore, impacts with regard to the exacerbation of fire risk as a result of installation or maintenance of associated infrastructure would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

d. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The majority of the Site Locations are located on vacant land with limited vegetation and are generally inaccessible to the public. The Project would not involve the construction of occupiable structures or attract people to the areas of improvement. No impacts with regard to exposing people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes would occur, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☒	☐	☐	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Potentially Significant Impact. Based on the analysis contained in this Initial Study, the Project has the potential to result in significant impacts with regard to the following issues: aesthetics (aesthetics, views, and light and glare), air quality; biological resources; cultural resources (historic and archaeological resources); energy; geology and soils (including paleontological resources); greenhouse gas emissions;

hazards and hazardous materials; land use and planning; noise; transportation; tribal cultural resources; and utilities and service systems (electric power). As such, the Project has the potential to degrade the quality of the environment.

An EIR will be prepared to analyze and document these potentially significant impacts, and feasible mitigation measures will be recommended to reduce any identified significant impacts.

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Potentially Significant Impact. The potential for cumulative impacts occurs when the impacts of the Project are combined with impacts from related development projects and result in impacts that are greater than the impacts of the Project alone. Located in the vicinity of the Site Locations for the TCN Structures are other current and reasonably foreseeable projects, the development of which, in conjunction with the Project, may contribute to potential cumulative impacts. Impacts of the Project on both an individual and cumulative basis will be addressed in the EIR for the following subject areas: aesthetics (aesthetics, views, and light and glare), air quality; biological resources; cultural resources (historic and archaeological resources); energy; geology and soils (including paleontological resources); greenhouse gas emissions; hazards and hazardous materials; land use and planning; noise; transportation; tribal cultural resources; and utilities and service systems (electric power).

Agriculture, Forestry Resources, and Mineral Resources

With regard to agriculture, forest resources, and mineral resources, no such resources are located on the Site Locations for the TCN Structures or in the surrounding areas. The Project would have no impact on these resources, and therefore could not combine with other projects to result in cumulative impacts. As such, cumulative impacts to agriculture, forest resources, and mineral resources would be less than significant.

Hydrology and Water Quality

With regard to hydrology and water quality, related projects could potentially result in an increase in surface water runoff and contribute point and non-point source pollutants to nearby water bodies. However, related projects would be subject to the City's Low Impact Development (LID) requirements. In addition, construction projects greater than one acre would be subject to NPDES permit requirements, including a Stormwater Pollution Prevention Plan, Standard Urban Stormwater Mitigation Plan requirements during operation, and other local requirements pertaining to hydrology and surface water quality, while smaller construction projects would be subject to local erosion control regulations, including the requirement to prepare a Local Stormwater Pollution Prevention Plan (SWPPP). It is anticipated that related projects would also be evaluated on an individual basis to determine appropriate BMPs and treatment measures to avoid significant impacts to hydrology and surface water quality. Thus, with implementation of standard regulatory requirements, Project impacts related to hydrology and water quality would not be cumulatively considerable and cumulative impacts would be less than significant.

Population and Housing

As discussed above, since the Project does not include a proposed housing component, it would not directly introduce a new residential population where none existed previously that could contribute to population growth in the City. In addition, as no housing currently exists on the Site Locations for the TCN Structures, the Project would not displace any existing housing. The related projects would be reviewed by the City on a case-by-case basis to determine consistency with area growth projections as well as housing impacts. Additionally, as discussed above, the Project would not generate employees located at the Site Locations. Given the limited extent of Project impacts, any contribution to cumulative impacts would not be cumulatively considerable.

Public Services

Due to the small size of the construction areas and limited duration of construction activities, construction of the Project would generate minimal demand for police and fire protection services. In addition, construction workers would not be expected to relocate their residences within this region or move from other regions into this region and thus would not generate a demand for additional schools, parks or libraries. Therefore, construction of the Project would not contribute considerably to cumulative demand for new fire facilities, police facilities, schools, parks, or other public facilities such as libraries, the construction of which could cause significant impacts.

As previously discussed, the Project does not propose the development of residential uses that would generate residential population growth or other uses that would generate new permanent employees. While the TCN Program could result in additional employees associated with operation of the TCN Program, the additional employees would not be substantial in number and would likely already live in the region. Therefore, operation of the Project would not result in any significant impacts associated with the demand for new fire facilities, police facilities, schools, parks, or other public facilities such as libraries, the construction of which could cause significant impacts. The Project would not contribute considerably to any cumulative impacts for fire facilities, police facilities, schools, parks, or other public facilities such as libraries, and cumulative impacts would be less than significant.

Utilities and Service Systems

Due to shared urban infrastructure, the Project and related projects would cumulatively increase demand on local utilities infrastructure. However, as discussed in Checklist Question No. XIX, sufficient infrastructure capacity is available to accommodate the Project. The Project would not involve wastewater generation or a demand for natural gas or telecommunication services during construction or operation. In addition, like the Project, related projects would be reviewed by the City to ensure that sufficient capacity exists or additional improvements are made to provide capacity prior to construction. Therefore, the Project would not contribute considerably to cumulative utilities and service system impacts, and cumulative impacts would be less than significant.

With regard to solid waste, the Project in conjunction with related projects would increase the need for solid waste disposal during their respective construction periods. However, as discussed in Checklist Question No. XIX, inert landfills serving the Project and the related projects would have sufficient capacity to accommodate construction waste disposal needs. The Project would not generate solid waste during operations. Furthermore, the County of Los Angeles conducts ongoing evaluations to ensure that landfill capacity is adequate to serve the forecasted disposal needs of the region. Therefore, the Project would

not contribute considerably to cumulative solid waste impacts, and cumulative solid waste impacts would be less than significant.

Wildfire

As discussed above, the Site Locations for the TCN Structures are located in an urbanized area and there are no wildlands located in the vicinity of the Site Locations. Therefore, the Project would not contribute to an increased wildfire risk. Moreover, the Project and related projects would be developed in accordance with LAMC and LAFD requirements pertaining to fire safety. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to wildfires. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact. As indicated in the analysis above, the Project could result in potentially significant impacts with regard to the following issues, which could, in turn, cause substantial adverse effects on human beings, either directly or indirectly: air quality, hazards and hazardous materials, and noise. As a result, these potential effects will be analyzed further in the EIR.