

V. Alternatives



V. Alternatives

1. Introduction

The identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process under CEQA. Specifically, Public Resources Code (PRC) Section 21001 states, in part, that the environmental review process is intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives which will avoid or substantially lessen such significant effects. In addition, PRC Section 21002.1(a) states, in part, that the purpose of an environmental impact report is to identify the significant effects on the environment of a project, identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.

Direction regarding the consideration and discussion of project alternatives in an EIR is provided in CEQA Guidelines Section 15126.6(a) as follows:

An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. An EIR is not required to consider alternatives which are infeasible.

The CEQA Guidelines indicate that the selection of project alternatives be based primarily on the ability to avoid or substantially lessen significant impacts relative to the proposed project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. The CEQA Guidelines further direct that the range of alternatives be guided by a “rule of reason,” such that only those alternatives necessary to permit a reasoned choice are addressed. In selecting project alternatives for analysis, potential alternatives must be feasible. CEQA Guidelines Section 15126.6(f)(1) states that:

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries [...], and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site [...]

Beyond these factors, CEQA Guidelines Section 15126.6(e) requires the analysis of a “no project” alternative and CEQA Guidelines Section 15126.6(f)(2) requires an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. If the environmentally superior alternative is the No Project Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives considered.

2. Overview of Selected Alternatives

As indicated above, the intent of the alternatives is to avoid or substantially lessen any of the significant effects of a project while still feasibly obtaining most of the basic project objectives. Based on the analyses provided in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with respect to historical resources related to Site Locations NFF-2, NFF-3, NFF-16, and NFF-21 that would result in permanent visual impacts by fundamentally affecting the integrity of setting and feeling of nearby historical resources. Aesthetics impacts associated with views of these historical resources and the visual character in the vicinity of these historical resources were also determined to be significant and unavoidable. In addition, land use impacts associated with inconsistency with land use plans and policies related to historical resources were also determined to be significant and unavoidable. Land use policy and related aesthetic policy impacts associated with placing off-site commercial signage (Site Locations FF-29 and FF-30) in the coastal area of the Palms - Mar Vista – Del Rey Community Plan Area were also determined to be significant and unavoidable.

Additionally, the Project would result in significant impacts that would be reduced to a less than significant level with implementation of mitigation measures with regard to the following: **biological resources, archaeological resources, paleontological resources, hazards and hazardous materials, noise and vibration, and tribal cultural resources.**

Based on the significant environmental impacts of the Project, the basic objectives established for the Project (refer to Section II, Project Description, of this Draft EIR), and the feasibility of the alternatives considered, the alternatives to the Project listed below were selected for evaluation:

- **Alternative 1, No Project Alternative:** Alternative 1 assumes that the Project would not be approved, no new permanent development would occur within the Site Locations, and the existing environment would be maintained. No existing static signs would be removed. Thus, the physical conditions of the Site Locations would generally remain as they are today. No new construction would occur. Further, no revenue would be generated from the Project to fund new and expanded transportation programs.
- **Alternative 2, Elimination of Impacts Relating to Historical Resources:** Alternative 2 would eliminate TCN Structures at Site Locations NFF-2, NFF-3, NFF-16, and NFF-21 proposed by the Project. The remaining 52 TCN Structures would be proposed under this alternative. As with the Project, Alternative 2 would provide for an overall reduction in static displays (at least a 2 to 1 square footage take-down ratio), throughout the City. Impacts to historical resources and the related aesthetic and land use impacts associated with Site Locations NFF-2, NFF-3, NFF-16, and NFF-21 would be eliminated. As with the proposed Project, under Alternative 2, the City would establish a Zoning Ordinance that would provide a mechanism to review and approve the TCN Structures citywide.
- **Alternative 3, Elimination of All Project Significant and Unavoidable Impacts:** Alternative 3 assumes that the Project would eliminate Site Locations NFF-2, NFF-3, NFF-16, and NFF-21, as well as eliminate or relocate FF-29 and FF-30 outside of the coastal area of the Palms–Mar Vista–Del Rey Community Plan. . As with the Project, Alternative 3 would provide for an overall reduction in static displays throughout the City. The remaining 50 TCN Structures would be proposed under this alternative. As with the Project, Alternative 3 would provide for an overall reduction in static displays (at least a 2 to 1 square footage take-down ratio), throughout the City. Impacts to aesthetics, historic resources, and land use would be eliminated. As with the Project, under Alternative 3 the City would establish a Zoning Ordinance that would provide a mechanism to review and approve the TCN Structures citywide.

**Table V-1
Summary Comparison of Development Proposed under Alternatives to the Project**

	Project	Alternative 1: No Project Alternative	Alternative 2: Elimination of Impacts Related to Historical Resources	Alternative 3: Elimination of All Significant and Unavoidable Impacts
Freeway Facing TCN Structures	34	0	34	34 ^a
Non-Freeway Facing TCN Structures	22	0	18	16
Total TCN Structures	56	0	52	50

^a Under Alternative 3, TCN Structures FF-29 and FF-30 would either be relocated outside the coastal area as determined in the Palms–Mar Vista–Del Rey Community Plan or would be eliminated.

Source: Eystone Environmental, 2022.

3. Alternatives Considered and Rejected from Further Analysis

As set forth in CEQA Guidelines Section 15126.6(c), the range of potential alternatives to a proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant impacts. As further set forth in CEQA Guidelines Section 15126.6(c), the EIR should briefly describe the rationale for selecting the alternatives to be discussed, as well as identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate an alternative from detailed consideration are the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts.

As summarized above, the Project's significant impacts result in part from proximity of TCN Structures NFF-2, NFF-3, NFF-16, and NFF-21 to historical resources and the associated historical resources, aesthetics, and land use plan consistency impacts. The size of the displays at these historically sensitive locations could be reduced, which would somewhat assist in reducing the impacts. However, in order to have a display of a size that can be properly viewed, the size of the display would not be substantially reduced and would still result in significant impacts if located in close proximity to historical resources. These Project impacts can be eliminated by either proposing alternative locations for these structures or by eliminating the locations of these TCN Structures. Elimination of the TCN structures that result in these impacts is included in Alternatives 2 and 3. The proposed Site Locations were chosen as they were the most feasible locations for construction and would not affect natural features such as trees and landscaping. The locations were also chosen based on their geographic spacing, and visibility and accessibility for commuters. Given the number of additional Metro properties located adjacent to freeways and major roadways, several alternative locations may be available that would also reduce these significant impacts to a less than significant level. Assuming that these alternative site locations would not be placed in proximity to historical resources and that the same mitigation measures for the Project would be implemented, these locations would result in impacts that would be similar to those of Alternative 2. In addition, Alternative 3 would eliminate Site Locations NFF-2, NFF-3, NFF-16, NFF-21, as well as eliminate or relocate Site Locations FF-29 and FF-30 outside of the coastal area of the Palms–Mar Vista–Del Rey Community Plan. Assuming that alternative site locations are available that would not be placed in proximity to historical resources and would not be located within the coastal area of the Palms–Mar Vista–Del Rey Community Plan, these locations would result in impacts that would be similar to those of Alternative 3. Therefore, an alternative location alternatives analysis is not further evaluated.

4. Alternatives Analysis Format

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the project objectives, identified in Section II, Project Description, of this Draft EIR, would be substantially attained by the alternative.¹ The evaluation of each of the alternatives follows the process described below:

- a. The net environmental impacts of the alternative are determined for each environmental issue area analyzed in Section IV, Environmental Impact Analysis, of this Draft EIR, assuming that the alternative would implement the same project design features and mitigation measures identified in Section IV, Environmental Impact Analysis, of this Draft EIR.
- b. Post-mitigation significant and non-significant environmental impacts of the alternative and the Project are compared for each environmental issue as follows:
 - Less: Where the net impact of the alternative would be clearly less adverse or more beneficial than the impact of the Project, the comparative impact is said to be “less.”
 - Greater: Where the net impact of the alternative would clearly be more adverse or less beneficial than the Project, the comparative impact is said to be “greater.”
 - Similar: Where the impact of the alternative and Project would be roughly equivalent, the comparative impact is said to be “similar.”
- c. The comparative analysis of the impacts is followed by a general discussion of whether the underlying purpose and basic Project objectives are feasibly and substantially attained by the alternative.

A summary matrix that compares the impacts associated with the Project with the impacts of each of the analyzed alternatives is provided in Table V-2 on page V-7.

¹ *State of California, CEQA Guidelines Section 15126.6 (c).*

**Table V-2
Comparison of Impacts Associated with the Alternatives**

Impact Area	Project	Alternative 1: No Project Alternative	Alternative 2: Elimination of Impacts Related to Historical Resources	Alternative 3: Elimination of All Significant and Unavoidable Impacts
A. AESTHETICS				
<i>Scenic Vistas</i>	Significant and Unavoidable	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Scenic Resources</i>	No Impact	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)
<i>Conflict with Zoning and Other Regulations Governing Scenic Quality/Visual Character</i>	Significant and Unavoidable	Less (No Impact)	Less (Significant and Unavoidable)	Less (Less Than Significant)
<i>Light and Glare</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
B. AIR QUALITY				
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
C. BIOLOGICAL RESOURCES				
<i>Biological Resources</i>	Less Than Significant with Mitigation	Less (No Impact)	Less (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)
D. CULTURAL RESOURCES				
<i>Historical Resources</i>	Significant and Unavoidable	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Archaeological Resources</i>	Less Than Significant with Mitigation	Less (No Impact)	Less (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)
E. ENERGY				
<i>Construction</i>	Less Than Significant	Less (No Impact)	Slightly Less (Less Than Significant)	Slightly Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Slightly Less (Less Than Significant)	Slightly Less (Less Than Significant)
<i>Conflict with Plans for Renewable Energy or Energy Efficiency</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
F. GEOLOGY AND SOILS				
<i>Geology and Soils</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Paleontological Resources</i>	Less Than Significant with Mitigation	Less (No Impact)	Less (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)
G. GREENHOUSE GAS EMISSIONS				
<i>Greenhouse Gas Emissions</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
H. HAZARDS AND HAZARDOUS MATERIALS				
<i>Construction</i>	Less Than Significant with Mitigation	Less (No Impact)	Less (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Slightly Less (Less Than Significant)	Slightly Less (Less Than Significant)
I. LAND USE AND PLANNING				
<i>Conflict with Land Use Plans</i>	Significant and Unavoidable	Less (No Impact)	Less (Significant and Unavoidable)	Less (Less Than Significant)
J. NOISE				
<i>Construction Noise</i>	Less Than Significant with Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
<i>Construction Vibration (Building Damage)</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)

**Table V-2 (Continued)
Comparison of Impacts Associated with the Alternatives**

Impact Area	Project	Alternative 1: No Project Alternative	Alternative 2: Elimination of Impacts Related to Historical Resources	Alternative 3: Elimination of All Significant and Unavoidable Impacts
<i>Construction Vibration (Human Annoyance)</i>	Less Than Significant with Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
<i>Operational Noise</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
K. TRANSPORTATION				
<i>Conflict with Plans</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Substantially Increase Hazards or Incompatible Uses</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
L. TRIBAL CULTURAL RESOURCES				
<i>Tribal Cultural Resources</i>	Less Than Significant with Mitigation	Less (No Impact)	Less (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)
M. UTILITIES AND SERVICE SYSTEMS				
<i>Electric Power</i>				
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Slightly Less (Less Than Significant)	Slightly Less (Less Than Significant)
Source: Eyestone Environmental, 2022.				

V. Alternatives

A. Alternative 1: No Project Alternative

1. Description of the Alternative

In accordance with the CEQA Guidelines, Alternative 1, the No Project Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states in part that, “in certain instances, the No Project Alternative means ‘no build’ wherein the existing environmental setting is maintained.” Accordingly, for purposes of this analysis, Alternative 1 assumes that the Project would not be approved, and no new TCN Structures would be constructed within the Site Locations. In addition, no existing static signs would be removed. Further, the proposed Zoning Ordinance for the TCN Program under the Project would not occur. Thus, the physical conditions of the Site Locations would generally remain as they are today. No new construction would occur. Further, no revenue would be generated from the Project to fund new and expanded transportation programs.

2. Environmental Impacts

a. Aesthetics

Under Alternative 1, no TCN Structures would be developed and as such, no changes in the views of or visual character in the vicinity of the Site Locations would result. Thus, the significant scenic vista, visual character, and plan policy impacts associated with Site Locations NFF-2, NFF-3, NFF-16, and NFF-21 and the significant plan policy impacts associated with FF-29 and FF-30 would be avoided. In addition, the less than significant impacts associated with impacts to light and glare, and consistency with plans and policies related to aesthetics would also not occur. However, the take-down program of existing static displays implemented as part of the Project would not occur under this alternative. As such, no net decrease of overall signage within the City would occur when compared to the Project. Overall, no impacts related to aesthetics would occur under Alternative 1 and the significant impacts of the Project would be avoided.

b. Air Quality

(a) Construction

Alternative 1 would not alter the existing on-site uses or require any construction activities on the Project Site. Therefore, Alternative 1 would not result in any construction emissions associated with construction worker and construction truck trips, fugitive dust from demolition and excavation, the use of heavy-duty construction equipment, or diesel particulate emissions during construction that could generate substantial toxic air contaminants (TACs). Therefore, construction-related regional and local air quality impacts, as well as the construction-related release of TACs would not occur. Thus, impacts related to regional and local air quality emissions, as well as construction related release of TACs would be less under Alternative 1 when compared to the less than significant impacts of the Project.

(b) Operation

Alternative 1 would not result in new development or increased operations that could generate additional operational emissions related to vehicular traffic or the consumption of electricity. Therefore, no operational air quality impacts associated with regional or local emissions would occur under Alternative 1. Thus, impacts related to regional air quality and emissions during operation would be less under Alternative 1 when compared to the less than significant impacts of the Project.

c. Biological Resources

Alternative 1 would not alter the existing land uses or site operations at the Site Locations. Therefore, Alternative 1 would result in no impacts to biological resources, which would be less when compared to biological resources impacts associated with the Project that were determined to be less than significant with mitigation.

d. Cultural Resources

(1) Historical Resources

As discussed in Section IV.D, Cultural Resources, of this Draft EIR, Site Locations NFF-2, NFF-3, NFF-16, and NFF-21 are located in the vicinity of historical resources. No construction activities that could potentially directly affect nearby historical resources would occur under Alternative 1, and Alternative 1 would not introduce structures or otherwise change the physical environment that could potentially indirectly affect the historical context of nearby historical resources. Therefore, Alternative 1 would result in no impacts to historical resources, which would avoid the significant and unavoidable impacts to historical

resources associated with development of Site Locations NFF-2, NFF-3, NFF-16, and NFF-21.

(2) Archaeological Resources

With regard to archaeological resources, as no construction activities would occur under this alternative, Alternative 1 would result in no impacts to archaeological resources. Thus, impacts would be less when compared to the impacts of the Project that were determined to be less than significant with mitigation.

e. Energy

(1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

(a) Construction

Construction activities would not occur under Alternative 1. As such, Alternative 1 would not generate a short-term demand for energy during construction and no impacts would occur. Therefore, the construction-related energy impacts of Alternative 1 would be less when compared to the less than significant impacts of the Project.

(b) Operation

Alternative 1 would not alter the existing land uses or site operations on the Site Locations. Therefore, Alternative 1 would not increase the long-term energy demand on the Site Locations. However, approximately 200 static displays would not be removed under Alternative 1, which would continue to use energy for nighttime illumination. Nonetheless, Alternative 1 would not increase operational energy consumption, and such impacts would be less when compared to the less than significant impacts of the Project.

(2) Conflict with Plans for Renewable Energy or Energy Efficiency

Alternative 1 would not involve any new development. As such, Alternative 1 would not have the potential to conflict with plans for renewable energy or energy efficiency. No impacts related to renewable energy or energy efficiency plans would occur under this alternative. Therefore, Alternative 1 would result in no conflicts with plans for renewable energy or energy efficiency and would be less when compared to the less than significant impacts of the Project.

f. Geology and Soils

(1) Geologic Hazards

No construction activities including earthwork would occur under Alternative 1. Therefore, no impact with respect to geologic hazards would occur. As such, impacts associated with geology and soils would be less when compared to the less than significant impacts of the Project.

(2) Paleontological Resources

No construction or earthwork would occur under Alternative 1. Therefore, no impact with respect to paleontological resources would occur. As such, paleontological resources impacts under Alternative 1 would be less when compared to the impacts of the Project that were determined to be less than significant with mitigation.

g. Greenhouse Gas Emissions

Alternative 1 would not develop new uses on the Site Locations. As such, no new greenhouse gas (GHG) emissions would be generated under Alternative 1. Therefore, Alternative 1 would result in no impacts related to GHG, and such impacts would be less when compared to the less than significant impacts of the Project.

h. Hazards and Hazardous Materials

(1) Construction

No construction or earthwork would occur under Alternative 1. Therefore, Alternative 1 would not result in the release of hazardous materials into the environment, and no impacts would occur. Therefore, hazards and hazardous materials impacts Alternative 1 would be less when compared to the Project's impacts that were determined to be less than significant with mitigation.

(2) Operation

Alternative 1 would not alter the existing uses on the Site Locations. Therefore, Alternative 1 would not result in any impacts associated with hazards and hazardous materials. Therefore, hazards and hazardous materials impacts under Alternative 1 would be less when compared to the less than significant impacts of the Project.

i. Land Use and Planning

Under Alternative 1, there would be no changes to the physical or operational characteristics of the existing Site Locations. Thus, no impacts associated with conflicts community plan policy impacts associated with Site Locations NFF-2, NFF-3, NFF-16, NFF-21, FF-29 and FF-30 would be avoided..Additionally, the proposed Zoning Ordinance for the TCN Program would not occur. Therefore, Alternative 1 would avoid the potentially significant land use impacts associated with the Project.

j. Noise

(1) Noise

(a) Construction

No construction or earthwork would occur under Alternative 1. As such, no construction-related on-site or off-site noise impacts would occur under this alternative. Therefore, construction noise impacts under Alternative 1 would be less when compared to the Project's noise impacts that were determined to be less than significant with mitigation.

(b) Operation

Alternative 1 would not develop new uses on the Site Locations. Thus, no new stationary or mobile (e.g., traffic) noise sources would be introduced to the Site Locations or the vicinity of the Site Locations. Therefore, Alternative 1 would result in no impacts to operation-related noise, which would be less when compared to the less than significant operational noise impacts of the Project.

(2) Vibration

(a) Construction

No construction or earthwork would occur under Alternative 1. As such, no construction-related on-site or off-site vibration impacts would occur under this alternative. Therefore, construction vibration impacts under Alternative 1 would be less when compared to the impacts of the Project that were determined to be less than significant with mitigation.

(b) Operation

Alternative 1 would not develop new uses on the Site Locations, and no changes to existing site operations would occur. Thus, no new on- or off-site vibration sources would be introduced to the Site Locations or the vicinity of the Site Locations. Therefore,

Alternative 1 would result in no impacts to operation-related vibration, which would be less when compared to the less than significant impacts of the Project.

k. Transportation

Since Alternative 1 would not develop new or additional land uses at the Site Locations, Alternative 1 would not conflict with programs, plans, ordinances, or policies addressing the circulation system or create hazardous geometric design features. Therefore, Alternative 1 would result in no impacts associated with transportation, which would be less when compared to the less than significant impacts of the Project.

l. Tribal Cultural Resources

No construction or earthwork would occur under Alternative 1. Therefore, there would be no potential for Alternative 1 to uncover subsurface tribal cultural resources. Therefore, Alternative 1 would result in no impacts to tribal cultural resources, which would be less when compared to the impacts of the Project that were determined to be less than significant with mitigation.

m. Utilities and Service Systems—Electric Power

(1) Construction

No construction or earthwork would occur under Alternative 1. Therefore, Alternative 1 would not generate a short-term demand for energy during construction, and construction-related impacts to electric power infrastructure would not occur. As such, construction-related electric power impacts under Alternative 1 would be less when compared to the less than significant impacts of the Project.

(2) Operation

Alternative 1 would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the long-term energy demand at the Site Locations. Therefore, Alternative 1 would result in no impacts to operation-related electric power and impacts would be less when compared to the less than significant impacts of the Project.

3. Comparison of Impacts

Alternative 1 would eliminate the Project's significant and unavoidable impacts with respect to historical resources and associated aesthetics and land use plan consistency impacts related to NFF-2, NFF-3, NFF-16 and NFF-21 as well as land use and aesthetics

plan consistency impacts related a policy prohibiting off-premise commercial signs in coastal areas associated with Site Locations FF-29 and FF-30. In addition, Alternative 1 would avoid the Project's less than significant impacts with mitigation, including those related to biological resources, archaeological resources, paleontological resources, hazards and hazardous materials, on-site construction noise, on-site construction vibration (pursuant to the significance threshold for human annoyance), and tribal cultural resources. However, the take-down program of existing static displays implemented as part of the Project would not occur under this Alternative. Impacts associated with the remaining environmental issues would be less than those of the Project.

4. Relationship of the Alternative to Project Objectives

Under Alternative 1, the existing Site Locations would remain unchanged and no new development would occur. Further, the existing static displays would remain. As such, Alternative 1 would not meet the underlying purpose of the Project, to 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. Furthermore, Alternative 1 would not meet any of the Project basic's objectives as listed below:

- Incorporate features for real-time data collection to aid in traffic signal timing, micro-transit data, and Metro vanpool on-demand services.
- Geographically space the multifunctional TCN Structures to expand Metro's transportation public messaging network and ability to broadcast information to commuters in a variety of ways to further increase Metro's visibility and accessibility for all commuters.
- Improve public safety by notifying the public of roadway improvements, road hazards, Earthquake Early Warning System notifications, Amber Alerts, and emergency situations.
- Maximize efficiency of the congested road network by promoting public awareness of travel alternatives based on geography and time constraints such as alternative routes, carpooling alternatives, and public transportation opportunities.
- Maximize advertising revenue that would be utilized by both Metro and the City to fund new and expanded transportation programs that would further Goal 2 of the Metro Vision 2028 Strategic Plan, by creating a funding source for programs

to enhance experiences for all Metro users such as improving security and increasing customer satisfaction.

- Implement Goal 4 of the Metro Vision 2028 Strategic Plan by creating an avenue for regional collaboration and comprehensive, timely, and real-time information sharing across government agencies to regionally improve traffic and transportation systems.
- Reduce overall square footage of existing static off-premise displays within the City of Los Angeles.
- Locate the TCN Structures at sites, elevations, and angles that would not increase distraction to motorists while still efficiently relaying information to commuters.

V. Alternatives

B. Alternative 2: Reduced Project— Elimination of Impacts Related to Historical Resources

1. Description of the Alternative

Alternative 2, the Reduced Project—Elimination of Impacts Related to Historical Resources Alternative, would eliminate Site Locations NFF-2, NFF-3, NFF-16, and NFF-21 proposed by the Project, while implementing the remainder of the 52 Site Locations. Under this alternative, 34 Freeway Facing Site Locations and 18 Non-Freeway Facing Site Locations. As with the Project, Alternative 2 would provide for an overall reduction in static displays throughout the City. As part of Alternative 2, a take-down program would be implemented, including at least a 2 to 1 square footage take-down ratio of existing static displays. Signage to be removed would include approximately 200 static displays located within the City.

As with the Project, under Alternative 2, 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.

2. Environmental Impacts

a. Aesthetics

(1) Scenic Vistas and Visual Character

As described in Section IV.A Aesthetics of this Draft EIR, under the Project, it is conservatively concluded that the proposed TCN Structures would result in significant impacts associated with views and visual character at Site Locations NFF-2, NFF-3, NFF-16 and NFF-21. Specifically, five historical resources, including the North Spring Street Bridge (Caltrans Bridge No. 53C0859), Lankershim Depot, the Little Tokyo Historic District, the Japanese Village Plaza, and the Fourth Street Bridge (Caltrans Bridge No. 53C0044) are located in close proximity to these TCN Structures. Under the Project, while the TCN Structures would not physically impact the historical resources, the TCN Structures would impede visibility of and thus detract from the character defining features

of these five historical resources and result in significant impacts associated with views of and the visual character in the vicinity of these historical resources. Under Alternative 2, Site Locations NFF-2, NFF-3, NFF-16 and NFF-21 would be eliminated to address these aesthetic impacts related to historical resources. Therefore, Alternative 2 would result in less than significant impacts with respect to scenic vistas and visual character, and such impacts would be less when compared to the significant impacts of the Project.

(2) Consistency with Regulations Regarding Scenic Quality

Alternative 2 would eliminate Site Locations NFF-2, NFF-3, NFF-16, and NFF-21 located in the Central City North, Central City, North Hollywood–Valley Village Community Plans. As such, the visual impacts related to historical resources would be eliminated and would be less than significant under Alternative 2. However, as with the Project, under Alternative 2, Site Locations FF-29 and FF-30 would remain inconsistent with the Palms–Mar Vista–Del Rey Community Plan policy prohibiting off-premise commercial signs in coastal areas since the proposed TCN Program would provide for off-premises advertising. Therefore, as with the Project, Alternative 2 would substantially conflict with the applicable goals, objectives, and policies set forth in the Palms–Mar Vista–Del Rey Community Plan relative to the placement of off-site commercial advertising in coastal areas. Overall, aesthetic impacts would be significant and unavoidable and substantially less than the Project, given the elimination of Site Locations NFF-2, NFF-3, NFF-16, and NFF-21.

(3) Light and Glare

As demonstrated by the detailed light and glare analysis included in Section IV.A Aesthetics and Appendix B of this Draft EIR, potential light and glare impacts associated with implementation of the proposed TCN Structures would be less than significant. As Alternative 2 would eliminate Site Locations NFF-2, NFF-3, NFF-16, and NFF-21 proposed by the Project, impacts to light and glare would be reduced due to the overall reduction in displays. Therefore, Alternative 2 would result in less than significant impacts with respect to light and glare, and such impacts would be overall less when compared to the less than significant impacts of the Project.

b. Air Quality

(1) Construction

As discussed in Section IV.B, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. As with the Project, Alternative 2 would comply with applicable air quality regulations and construction-related daily maximum regional construction emissions (i.e., combined on-site and off-site

emissions) would not exceed the SCAQMD daily significance thresholds for VOC, CO, SO_x, PM₁₀, or PM_{2.5}.

Under Alternative 2, construction activities would be reduced in comparison to the Project due to the reduction in development (i.e. a reduction in the total number of TCN Structures). However, the intensity of air emissions and fugitive dust from site preparation and construction activities under Alternative 2 would be similar to the Project on peak construction days because the anticipated construction schedule for each TCN Structure would remain the same as the Project. As such, air emissions during maximum activity days, which is one of the metrics used for measuring impact significance, would be similar to those of the Project. Further, on-site construction activities under Alternative 2 would be located at similar distances from sensitive receptors as the Project. Therefore, Alternative 2 would result in less than significant impacts with respect to construction-related air quality impacts, and such impacts would be similar when compared to the Project's less than significant impacts.

As with the Project, construction of Alternative 2 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.B, Air Quality, of this Draft EIR, the Project would result in less than significant impacts with regard to construction TAC emissions. Overall construction TAC emissions generated by Alternative 2 would be less than those of the Project due to the reduction in total TCN Structures and excavation activities. However, the intensity of diesel particulate emissions associated with heavy equipment operations during grading and excavation activities under Alternative 2 would be similar to the Project on peak construction days because the anticipated construction schedule for each TCN Structure would remain the same as the Project. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 2 would be less than significant and similar when compared to the less than significant impacts of the Project.

(2) Operation

Similar to the Project, Alternative 2 would not generate trips and VMT on a regular basis during operations. Trips would be limited to two vehicles (roundtrips) per day for maintenance activities to cover all 52 TCN Structures. Therefore, Alternative 2 would result in similar daily VMT when compared to the Project. Thus, as with the Project, regional and local emissions from Alternative 2 would not exceed any SCAQMD's daily regional or local operational thresholds. Therefore, regional and local operational emissions resulting from Alternative 2 would be less than significant and similar to those of the Project that would be less than significant.

As set forth in Section IV.B, Air Quality, of this Draft EIR, other potential air toxics associated with Project operations include light painting activities and emissions from diesel power equipment associated with maintenance activities. However, these activities are not considered land uses that generate substantial TAC emissions. Overall operation TAC emissions generated by Alternative 2 would be less than those of the Project due to the reduction in total TCN Structures. However, the limited intensity of maintenance activities during operations under Alternative 2 would be similar to the Project on peak operation days because the anticipated operation schedule for each TCN Structure would remain the same as the Project. Therefore, Alternative 2 would not release substantial amounts of TACs. Impacts due to TAC emissions and the corresponding cancer risk under Alternative 2 would be less than significant and similar when compared to the less than significant impacts of the Project.

c. Biological Resources

Alternative 2 would eliminate Site Locations NFF-2, NFF-3, NFF-16, and NFF-21 proposed by the Project, while constructing the remainder of the 52 Site Locations, as well as implementing a take-down program of existing static displays. As such, Alternative 2 also has the potential to affect areas where biological resources and sensitive habitats exist in the vicinity as described in Section IV.C, Biological Resources, of this Draft EIR. As with the Project, Alternative 2 would have potential impacts associated with the following: five special-status plant species, six federally and/or State-listed wildlife species, and suitable habitat for 10 other special-status wildlife species. Alternative 2 would implement the Project's Mitigation Measures BIO-MM-1 through BIO-MM-4, as applicable to the specific Site Location as described in Section IV.C, Biological Resources. Further, as TCN Structures NFF-2, NFF-3, NFF-16, and NFF-21 would not cause an impact to candidate, sensitive, or special status species elimination of these four TCN Structures would not reduce the impact. Therefore, Alternative 2 would result in less than significant impacts with mitigation incorporated with respect to impacts to candidate, sensitive, or special status species, and such impacts would be similar when compared to the Project's less than significant impacts with mitigation incorporated.

Similar to the Project, Alternative 2 would include areas within the BSA of Site Locations FF-24 and FF-25 where a sensitive vegetation community may occur. Therefore, like the Project, Alternative 2 would implement the Project's Mitigation Measure BIO-MM-1, which includes provisions for placement of exclusion fencing to avoid sensitive vegetation if present. Further, as TCN Structures NFF-2, NFF-3, NFF-16, and NFF-21 would not cause an impact to sensitive natural communities, elimination of these four TCN Structures would not reduce the impact. Therefore, Alternative 2 would result in less than significant impacts with mitigation incorporated with respect to impacts to sensitive natural communities, and such impacts would be similar when compared to the Project's less than significant impacts with mitigation incorporated.

Similar to the Project, Alternative 2, would include three features potentially subject to USACE, RWQCB, and/or CDFW jurisdiction within the BSA including the LA River, Haskell Creek, and one unnamed concrete-lined channel is within the BSA. Potential short-term indirect impacts to downstream aquatic resources could occur if fill or hazardous material were to spill into the drainages. Like the Project, Alternative 2 would implement Mitigation Measure BIO-MM-1, which includes provisions for preconstruction surveys, worker awareness training, placement of exclusion fencing to avoid aquatic features, and monitoring of construction activities by a qualified biologist. Further, Alternative 2 eliminates Site Location NFF-2 which under the Project would be located in the vicinity of the LA River, and therefore would lessen the impacts when compared to the Project. As such, Alternative 2 would result in less than significant impacts with mitigation incorporated with respect to aquatic resources, and such impacts would be less when compared to the Project's less than significant impacts with mitigation incorporated given the elimination Site Location NFF-2.

As with the Project, under Alternative 2, the LA River could potentially be utilized as a corridor or habitat linkage by wildlife. As with the Project, under Alternative 2, the Site Locations that would be located in the vicinity of LA River are in areas with commercial and industrial uses. As with the Project, it is highly unlikely that Alternative 2 construction and operations would have any impact on wildlife in the LA River. However, wildlife may stray outside of the LA River and closer to Alternative 2 construction or operations. Like the Project, Alternative 2 would implement Mitigation Measures BIO-MM-1, BIO-MM-2, and BIO-MM-4, which include numerous provisions that would reduce potential impacts on wildlife migrating through the LA River to less than significant levels. Further, Alternative 2 eliminates Site Location NFF-2 which under the Project would be located in the vicinity of the LA River, and therefore would lessen the impacts when compared to the Project. As such, Alternative 2 would result in less than significant impacts with mitigation incorporated with respect to impacts to wildlife corridors, and such impacts would be less when compared to the Project's less than significant impacts with mitigation incorporated given the elimination Site Location NFF-2.

Overall, Alternative 2 would result in less than significant impacts with mitigation incorporated with respect to biological resources impacts, and such impacts would be less when compared to the Project's less than significant impacts with mitigation incorporated, given the elimination of four TCN Structures.

d. Cultural Resources

(1) Historical Resources

As discussed in Section IV.D, Cultural Resources, of this Draft EIR, the Project would result in significant impacts associated with the visual character and setting of five

historical resources, including the North Spring Street Bridge (Caltrans Bridge No. 53C0859), Lankershim Depot, the Little Tokyo Historic District, the Japanese Village Plaza, and the Fourth Street Bridge (Caltrans Bridge No. 53C0044) resulting from the construction of Site Locations NFF-2, NFF-3, NFF-16, and NFF-21. Alternative 2, would eliminate Site Locations NFF-2, NFF-3, NFF-16, and NFF-21 proposed by the Project, while implementing the remainder of the 52 Site Locations, as well as implementing a take-down program of existing static displays. Therefore, Alternative 2 would remove the four TCN Structures that would create a potential impact to historical resources and would result in less than significant impacts with respect to historical impacts. Overall, under Alternative 2, impacts to historical resources would be less than significant and Alternative 2 would eliminate the significant and unavoidable impacts of the Project.

(2) Archaeological Resources

Like the Project, the TCN Structures proposed under Alternative 2 would be constructed with the use of a drill rig that would drill a hole up to 50 feet in depth on an approximately 10-foot by 10-foot area, depending on soil conditions and size of the digital display. Thus, there may be a potential to encounter unknown archaeological resources that could be present at the Site Locations. Therefore, impacts with regard to archaeological resources are potentially significant. As such, Alternative 2 would implement Mitigation Measure CUL-MM-1, which includes retention of a qualified archaeologist to implement a Cultural Resource Monitoring and Treatment Plan to address the potential discovery of archaeological resources. Therefore, Alternative 2 would result in less than significant impacts with mitigation incorporated with respect to archaeological resources impacts, and such impacts would be less when compared to the Project's less than significant impacts with mitigation incorporated given the elimination of four TCN Structures.

e. Energy

(1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

(a) Construction

Similar to the Project, during construction of Alternative 2, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electric equipment, or other construction activities necessitating electrical power. Similar to the Project, construction activities associated with Alternative 2 would not involve the consumption of natural gas. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Site Locations, construction worker travel to and from the Site Locations, and delivery and haul truck trips

(e.g., hauling of demolition material to off-site reuse and disposal facilities, as well as trips associated with the delivery of the TCN Structure materials). However, the energy consumed during construction of Alternative 2 would be reduced compared to the Project due to the reduction in overall TCN Structures. As with the Project, the use of construction equipment/vehicles used during construction of Alternative 2 would incorporate a variety of energy conservation measures to reduce energy usage and additional efficiency requirements under various regulations, such as Title 24 energy efficiency requirements, CALGreen Code, Metro's 2019 CAAP, as well as Metro and City building codes, which may further reduce Project-related consumption.

Therefore, as with the Project, Alternative 2 construction activities would not require energy demand that is wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 2 and slightly less when compared to the less than significant impacts, given the elimination of four TCN Structures.

(b) Operation

As with the Project, during operation of the Alternative 2, energy would be consumed mainly for lighting and display purposes. Energy would also be consumed during operations related to maintenance activities vehicle trips. Similar to the Project, Alternative 2 would not generate trips and VMT on a regular basis during operations. Trips would be limited to two vehicles (roundtrips) per day for maintenance activities to cover all 52 TCN Structures. As such, Alternative 2 would result in slightly less energy consumed during maintenance activities for vehicle trips when compared to the Project. Therefore, as with the Project, operation of Alternative 2 would not involve the wasteful, inefficient, or unnecessary consumption of energy resources. Overall, Alternative 2 would result in less than significant impacts related to energy use during operation, and such impacts would be slightly less than the less than significant impacts of the Project.

(2) Conflict with Plans for Renewable Energy or Energy Efficiency

As with the Project, the energy conservation policies and plans relevant to the Project and Alternative 2 include the California Title 24 energy standards, the 2019 CALGreen Code, Metro's Green Construction Policy, Metro's CAAP, the City of Los Angeles Green Building Code, City of LA Green New Deal, and SCAG's 2020–2045 RTP/SCS. Similarly, these conservation policies would be implemented as part of Alternative 2, Alternative 2 would not conflict with applicable plans for renewable energy or energy efficiency. As with the Project, during construction activities, Alternative 2 would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations reducing unnecessary energy consumption. Therefore, Alternative 2 would not conflict with plans for renewable energy or energy efficiency. Thus, the impacts of

Alternative 2 associated with conflict with plans regarding energy would be less than significant and similar to the less than significant impacts of the Project.

f. Geology and Soils

(1) Geologic Hazards

The Site Locations are located within the seismically active region of Southern California. Thus, as with the Project, under Alternative 2 impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, liquefaction, seismically induced settlement, and subsidence, would be similar to those under the Project since such impacts are a function of the Site Locations' underlying geologic conditions. As with the Project, Alternative 2 would implement Project Design Feature GEO-PDF-1 to incorporate the professional recommendations contained in the Geology and Soils Evaluation and associated recommendations set forth in a site location-specific, design-level geologic and geotechnical investigation(s). Further Alternative 2 would also be subject to all applicable regulations, including the applicable provisions in the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the California Building Code, Metro Rail Design Criteria, the City's General Plan Safety Element, and the Los Angeles Building Code. Lastly, similar to the Project, Alternative 2 would not include uses such as mining operations, deep excavation into the earth, or boring of large areas creating unstable seismic conditions or stresses in the earth's crust. Overall, given the similar construction methods, construction types, and amount of grading and excavation, Alternative 2 impacts related to geology and soils would result in less than significant impacts with respect to geologic hazards impacts, and such impacts would be less when compared to the Project's less than significant impacts, given the elimination of four TCN Structures.

(2) Paleontological Resources

Alternative 2 would eliminate Site Locations NFF-2, NFF-3, NFF-16, and NFF-21 proposed by the Project, while constructing the remainder of the 52 Site Locations, as well as implementing a take-down program of existing static displays. The 52 TCN Structures would be constructed in a similar manner as the Project, including the use of a drill rig that would drill a hole up to 50 feet in depth on an approximately 10-foot by 10-foot area, depending on soil conditions and size of the digital display. Similar to the Project, at several Site Locations under Alternative 2, bedrock may be encountered underlying the alluvial soils at various depths. The type of bedrock that may be encountered varies with the Site Location and includes the Upper Miocene Puente Formation, the Upper Topanga Formation, Marine Sediments, and the Fernando Formation. These bedrock formations can be conducive to preserving vertebrate fossils. Like the Project, under Alternative 2 it is possible that paleontological resources may be encountered during grading and drilling

operations within the Site Locations. Therefore, potential impacts to unique paleontological resources would be potentially significant. As such, Alternative 2 would implement Mitigation Measure GEO-MM-1 which requires the development of a site-specific Paleontological Resource Mitigation and Treatment Plan. Therefore, Alternative 2 would result in less than significant impacts with mitigation incorporated with respect to paleontological resources impacts, and such impacts would be less when compared to the Project's less than significant impacts with mitigation incorporated, given the elimination of four TCN Structures.

g. Greenhouse Gas Emissions

As discussed in Section IV.C, Greenhouse Gas Emissions, of this Draft EIR, GHG emissions from a development project are determined in large part by the number of daily vehicle trips generated and associated VMT, as well as by energy consumption from proposed land uses. As previously discussed above, due to the reduction in TCN Structures, the number of daily trips, daily VMT, and energy consumption under Alternative 2 would be reduced compared to the Project. Thus, the amount of GHG emissions generated by Alternative 2 would be less than the amount generated by the Project. As with the Project, Alternative 2 would be designed to comply with the requirements of the construction protocols required by Metro's Green Construction Policy, the Los Angeles Green Building Code and the CALGreen Code. With compliance with applicable regulations and with implementation of comparable sustainability features as the Project, Alternative 2 would be consistent with the GHG reduction goals and objectives included in adopted State, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 2 would be less than significant and less when compared to the less than significant impacts of the Project.

h. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, during construction of Alternative 2, hazardous materials, such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, would be used and, therefore, would require proper handling and management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases and, subsequently, the exposure of the public to hazardous materials. However, all potentially hazardous materials would be used, stored, and disposed in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use.

With respect to existing conditions, as with the Project, Alternative 2 would be located adjacent to freeways and major roadways on Metro-owned properties. The majority of the proposed Site Locations are used primarily for Metro operations, which include rail corridors, stations, parking, bus depots, and equipment lots. The primary Chemicals of Concern (COCs) likely to be encountered at all Site Locations include total tetroleum hydrocarbons as gasoline (TPHg), total petroleum hydrocarbons as diesel (TPHd), total tetroleum hydrocarbons as oil (TPHo), arsenic, lead, chromium and polynuclear aromatic hydrocarbons (PAHs). Additionally, of the 56 Site Locations proposed under the Project, 20 are also known to contain solvent hydrocarbons (primarily Perchloroethylene [PCE]/TCE [tetrachloroethylene] and breakdown by-products) and gasoline. Lastly, two Site Locations may contain on-site oil wells (Site Locations FF-4 and NFF-21) and two Site Locations may contain on-site USTs (NFF-3 and NFF-18). Accordingly, like the Project, Alternative 2 would implement the Project's Mitigation Measures HAZ-MM-1 through HAZ-MM-3 to reduce impacts associated with contaminated soil and soil gas, as well as potential onsite oil wells and USTs to a less than significant level. Additionally, the elimination of NFF-3 and NFF-21 would result in the removal of a Site Location with a potential onsite UST and a Site Location with a potential on-site oil well. Therefore, Alternative 2 would result in less than significant impacts with mitigation incorporated with respect to construction-related hazards and hazardous materials impacts, and such impacts would be less when compared to the Project's less than significant impacts with mitigation incorporated, given the elimination of four TCN Structures.

(2) Operation

Operation of Alternative 2 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. Overall, potential hazards impacts would be less than significant and less than the less than significant impacts of the Project as a result of elimination of Site Locations NFF-2, NFF-3, NFF-16, and NFF-21.

i. Land Use and Planning

Alternative 2 would eliminate Site Locations NFF-2, NFF-3, NFF-16, and NFF-21 located in the Central City North, Central City, North Hollywood–Valley Village Community Plans. As such, the inconsistency with the polices protecting historic resources found in these three community plans would be eliminated as part of this alternative. Additionally, Alternative 2 would no longer substantially conflict with the applicable goals, objectives, and policies set forth in the Conservation Element adopted for the purpose of avoiding or mitigating an environmental effect with regard to historic resources. Therefore, with the

elimination of Site Locations NFF-2, NFF-3, NFF-16, and NFF-21, land use impacts relative to the substantial conflict with historical resources policies would be less than significant under Alternative 2 and would eliminate the significant and unavoidable impact under the Project.

Under Alternative 2, Site Locations FF-29 and FF-30 would be inconsistent with the Palms–Mar Vista–Del Rey Community Plan policy prohibiting off-premise commercial signs in coastal areas since the proposed TCN Program would provide for off-premises advertising to fund new and expanded transportation programs, in addition to their functions to improve the transportation system and provide communication during emergency events. Therefore, as with the Project, Alternative 2 would substantially conflict with the applicable goals, objectives, and policies set forth in the Palms–Mar Vista–Del Rey Community Plan relative to the placement of off-site commercial advertising in coastal areas. Impacts would be significant and unavoidable and similar to the Project.

Overall, Alternative 2 would not cause an overall conflict with or impede implementation of the Coastal Act, Vision Plan, or General Plan, or the environmental policies in other applicable plans adopted for the purpose of avoiding or mitigating an environmental effect. Further, Alternative 2 would eliminate the significant and unavoidable impact for land use relative to the substantial conflict with historical resources policies. However, as with the Project, Alternative 2 would substantially conflict with the applicable policy set forth in the Palms–Mar Vista–Del Rey Community Plan relative to the placement of off-site commercial advertising in coastal areas. Therefore, impacts related to conflicts with applicable plans, policies, and regulations would be significant and unavoidable and substantially less than the significant and unavoidable impacts of the Project.

j. Noise

(1) Noise

(a) Construction

Under Alternative 2, construction activities would be reduced in comparison to the Project due to the reduction in development (i.e. a reduction in total number of TCN Structures). However, the types of construction activities under Alternative 2 would be similar to the Project for the construction of a single TCN Structure and take-down of a single static display. As with the Project, construction of Alternative 2 would generate noise from the use of heavy-duty construction equipment, as well as from haul truck and construction worker trips. Under Alternative 2, on- and off-site construction activities and the associated construction noise levels would be expected to be similar to that of the Project during maximum activity days during the excavation phases (i.e., there would be no change to the intensity for days in which the maximum construction activity is required). As

such, noise levels during maximum activity days, which is one metric used for measuring impact significance, would be similar to those of the Project. As with the Project, Alternative 2 would implement Project Design Feature NOI-PDF-1 for construction of the TCN Structures as well as take-down of the existing static displays. Further, Mitigation Measure NOI-MM-1 and NOI-MM-2 would minimize construction noise for the TCN Structures. Additionally, Mitigation Measure NOI-MM-3, would minimize construction noise during take-down of the existing static displays. Therefore, Alternative 2 would result in less than significant impacts with mitigation incorporated with respect to construction-related noise impacts, and such impacts would be similar when compared to the Project's less than significant impacts with mitigation incorporated.

(b) Operation

As discussed in Section IV.F, Noise, of this Draft EIR, Project operations would not generate vehicle trips on a daily basis and would occur occasionally for maintenance activities on an as-needed basis. Therefore, like the Project, Alternative 2 is not anticipated to generate any measurable on-site or off-site noise sources. Therefore, Alternative 2 operations would not result in the generation of a substantial permanent increase in ambient noise levels in the vicinity of the Site Locations in excess of standards established in the City's general plan or noise ordinance, or applicable standards of other agencies. Therefore, Alternative 2's operational noise impacts from on- and off-site sources would be less than significant and similar when compared to the less than significant impacts of the Project.

(2) Vibration

(a) Construction

As noted above, under Alternative 2, construction activities would be reduced in comparison to the Project due to the reduction in development (i.e. a reduction in total number of TCN Structures). However, the types of construction activities under Alternative 2 would be substantially similar to the Project for the construction of a single TCN Structure and take-down of a single static display. As with the Project, construction of Alternative 2 would generate ground-borne construction vibration during drilling for the structure foundation and the trenching and site excavation/grading activities when heavy construction equipment, such as drill rigs and loaded trucks, would be used. As with the Project, Alternative 2, would implement Mitigation Measure NOI-MM-2 which would require construction of TCN Structure NFF-20 to be complete prior to the occupancy of the adjacent future residential building, or alternatively, Mitigation Measure NOI-MM-4, if construction occurs after the adjacent residential building is constructed and occupied. Further, as with the Project, Alternative 2 would implement Mitigation Measure NOI-MM-4 to minimize construction vibration impacts (human annoyance) on the existing sensitive receptor, located 30 feet from Site Location FF-33. Further, under Alternative 2, impacts

related to on-site and off-site construction vibration (human annoyance) for the construction of all other TCN Structures would be less than significant. Vibration impacts (pursuant to the significance criteria for building damage) during construction of the Alternative 2 would also be less than significant. Therefore, although the overall amount and duration of construction activities (including excavation) would be reduced under Alternative 2, on- and off-site construction activities and the associated construction on- and off-site vibration levels would be expected to be similar to those of the Project as construction vibration impacts are evaluated based on the maximum (peak) day vibration levels generated by each type of construction equipment (i.e., there would be no change to the intensity for days in which the maximum construction activity is required). In addition, the removal of the existing static displays would not require the use of large earthmoving equipment. Therefore, vibration associated with the existing static displays removal (e.g., mobile crane, container truck and small backhoe) would be well below the human annoyance significance threshold. Therefore, Alternative 2 would result in less than significant impacts with mitigation incorporated with respect to construction-related vibration impacts, and such impacts would be similar when compared to the Project's less than significant impacts with mitigation incorporated.

(b) Operation

As described above, Alternative 2 operations would not generate any significant on-site and off-site vibration sources. Therefore, operation of Alternative 2 would not result in the generation of excessive ground-borne vibration levels that would be perceptible in the vicinity of the Project Site. As such, vibration impacts associated with operation of the Alternative 2 would be less than significant and similar when compared to the less than significant impacts of the Project.

k. Transportation

As previously described, Alternative 2 would include development of the same Site Locations as the Project with the exception of the elimination of Site Locations NFF-2, NFF-3, NFF-16, and NFF-21. As such, the plans, policies, and programs applicable to the Project would also apply to Alternative 2. As with the Project, this alternative would be consistent with Metro's 2028 Vision Plan by improving the County's overall transit network and assets and helping to deliver outstanding trip experiences for all users of the transportation system. Additionally, Alternative 2 would support the goals of the 2020–2045 RTP/SCS including increasing the travel choices within the transportation system by creating advertising that would be utilized by both Metro and the City to fund new and expanded transportation programs. Further, Alternative 2 would be consistent with the City of Los Angeles' Mobility Plan by improving transit access and service to major regional destinations, job centers, and inter-modal facilities as the TCN Structures would be equipped with Metro's RIITS, which provides comprehensive, timely, and real-time

information among freeway, traffic, transit, and emergency systems across various agencies including local and regional transit agencies, to improve traffic and transportation systems, and to disseminate information regarding roadway improvements, and during emergency events. As such, Alternative 2 would support these transportation plans for the same reasons as the Project, and therefore, would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be less than significant and similar to the less than significant impact of the Project.

Alternative 2 would eliminate Site Locations NFF-2, NFF-3, NFF-16, and NFF-21 proposed by the Project, while implementing the remainder of the 52 Site Locations. The TCN Program under the Project was found to operate similarly to the Commercial Electronic Variable Message Signs (CEVMS) in the studies reviewed. Thus, it is anticipated that driver fixation on the TCN Structures would similarly be below the NHTSA threshold for dangerous driver distraction of 2.0 seconds. Thus, this same determination would apply to Alternative 2.

Furthermore, as with the Project, as part of the TCN Structures proposed under Alternative 2, operation, motion and flashing images would be prohibited and transitions between messages would be instant without using a black screen between messages. Light emitted by the TCN Structures would also be adjustable throughout the day and night, ensuring that the signs would not cause excessive glare on nearby roadways. The signs would also be positioned to focus on the intended roadways and minimize visibility from adjacent streets. Alternative 2 would also be consistent with regulations regarding allowable sign luminance, shadows, and glare, and specifically with CVC 21466.5. Additionally, as with the Project, the Freeway Facing TCN Structures were reviewed for consistency with Caltrans guidelines and all of the signs were found to be compliant with the guidelines for digital signage adjacent to a freeway. Also, the non-freeway facing signs would operate based on established industry standards for refresh rate. As such, impacts associated with the substantial increase in hazards or incompatible uses during the operation of the Alternative 2 would be less than significant and less when compared to the less than significant impacts of the Project, given the elimination of four TCN Structures.

I. Tribal Cultural Resources

Alternative 2, would eliminate Site Locations NFF-2, NFF-3, NFF-16, and NFF-21 proposed by the Project, while constructing the remainder of the 52 Site Locations. Alternative 2 would also implement a take-down program of existing static displays. As with the Project, the proposed Site Locations under Alternative 2 may contain known or reasonably foreseeable tribal cultural resources determined by Metro to be significant pursuant to criteria set forth in PRC Section 5024.1 (i.e., tribal cultural resources). As such, the Alternative 2 may cause a substantial adverse change in the significance of a known tribal cultural resource with cultural value to a California Native American tribe or that is

listed or eligible for listing in the California Register or in a local register. Therefore, as with the Project, impacts related to tribal cultural resources would be less than significant with the implementation of Mitigation Measures MM-TCR-1 through MM-TCR-3. Therefore, Alternative 2 would result in less than significant impacts with mitigation incorporated with respect to tribal cultural resources impacts, and such impacts would be less when compared to the Project's less than significant impacts with mitigation incorporated, given the elimination of four TCN Structures.

m. Utilities and Service Systems

(3) Energy Infrastructure

(a) Construction

Alternative 2, would eliminate Site Locations NFF-2, NFF-3, NFF-16, and NFF-21 proposed by the Project, while constructing the remainder of the 52 Site Locations. Alternative 2 would also implement a take-down program of existing static displays. Construction activities at the Site Locations would require minimal electricity for lighting and equipment. Furthermore, short-term and intermittent energy usage during construction is generally far less than ongoing usage during a project's operational phase; thus, operational demands are the primary means for analyzing infrastructure capacity. Overall, demolition and construction activities would require minimal electricity consumption as compared to the existing energy usage for the existing static displays.

As previously noted, the energy consumed by Alternative 2 would be slightly reduced compared to the Project due to the reduction in the overall amount of construction activities related to the elimination of four TCN Structures. Therefore, impacts on infrastructure capacity associated with short-term construction activities under Alternative 2 would be less than significant and less when compared to the less than significant impacts of the Project, given the elimination of four TCN Structures.

(b) Operation

The Project is anticipated to result in a net new on-site demand for electricity totaling approximately 2,288,691 kWh per year when accounting for removal of the existing static displays. Based on LADWP's 2017 Power Strategic Long-Term Resources Plan, LADWP forecasts that its total energy sales in the 2025-2026 fiscal year (the Project's buildout year) would be 23,537 GWh of electricity.^{2,3} As such, the Project-related annual electricity

² LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.

³ LADWP, 2017 Power Strategic Long-Term Resources Plan, Appendix A, Table A-1, December 2017.

consumption of 3,288,690 kWh per year would represent less than 0.1 percent of LADWP's projected sales in 2025. In comparison to the LADWP power grid base peak load of 5,820 MW in 2017, the Project Site net energy demand would represent 0.012 percent of the LADWP base peak load conditions. This demand would not significantly affect the ability of LADWP to accommodate peak electrical demands. As Alternative 2 would construct a reduced number of TCN Structures when compared to the Project, impacts would be reduced when compared to the Project. Furthermore, as with the Project, Alternative 2 would include the installation of any necessary new lines, connections, and upgrades required by LADWP to ensure adequate service to the Site Locations. Therefore, LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support Alternative 2's operational electricity demand. Based on the above, operation of the Alternative 2 would not result in an increase in demand for electricity that exceeds the existing available supply or distribution infrastructure capabilities, such that there would be a need for new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. As such, Alternative 2 would result in less than significant impacts related to energy infrastructure during operation, and such impacts would be slightly less than the less than significant impacts of the Project, given the elimination of four TCN Structures.

3. Comparison of Impacts

Based on the analysis above, the significant and unavoidable land use and aesthetic plan policy impacts related to inconsistencies associated with placement of off-site commercial signage within the coastal area of the Palms–Mar Vista–Del Rey Community Plan area as a result of Site Locations FF-29 and FF-30 would remain under Alternative 2. However, Alternative 2 would avoid the Project's significant and unavoidable historical resources impacts and related aesthetics and land use consistency impacts associated with Site Locations NFF-2, NFF-3, NFF-16, and NFF-21. Therefore, the significant and unavoidable impacts under Alternative 2 would be substantially less than the significant and unavoidable impacts of the Project. Alternative 2 would also reduce the overall duration of construction activities for the TCN Program. In addition, Alternative 2 would reduce several of the less than significant impacts and less than significant impacts with mitigation associated with the Project (e.g., biological resources, archaeological resources, energy, greenhouse gas emissions, geology and soils, paleontological resources, hazards and hazardous materials, transportation, tribal cultural resources, and energy infrastructure). All other impacts would be similar to those of the Project.

4. Relationship of the Alternative to Project Objectives

Alternative 2 would eliminate TCN Structures NFF-2, NFF-3, NFF-16, and NFF-21 proposed by the Project. The remaining 52 TCN Structures would be constructed under this alternative. Like the Project, Alternative 2 would provide for an overall reduction in static displays (at least a 2 to 1 square footage take-down ratio), throughout the City. Additionally, as with the proposed Project, under Alternative 2, the City would establish a Zoning Ordinance that would provide a mechanism to review and approve the TCN Structures citywide.

As discussed above, the underlying purpose of the Project is to provide a network of 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. Alternative 2 would meet the underlying purpose of the Project, but to a lesser extent than the Project due to the reduction in TCN Structures.

Regarding the Project objectives, Alternative 2 would meet the following Project objectives as effectively as the Project:

- Incorporate features for real-time data collection to aid in traffic signal timing, micro-transit data, and Metro vanpool on-demand services.
- Improve public safety by notifying the public of roadway improvements, road hazards, Earthquake Early Warning System notifications, Amber Alerts, and emergency situations.
- Implement Goal 4 of the Metro Vision 2028 Strategic Plan by creating an avenue for regional collaboration and comprehensive, timely, and real-time information sharing across government agencies to regionally improve traffic and transportation systems.
- Reduce overall square footage of existing static off-premise displays within the City of Los Angeles.
- Locate the TCN Structures at sites, elevations, and angles that would not increase distraction to motorists while still efficiently relaying information to commuters.

Alternative 2 would also meet the following Project objectives, although it would not do so as effectively as the Project due to the reduced number of TCN Structures under this alternative. Specifically, under Alternative 2 fewer TCN Structures would limit the number of advertisements, thus limiting possible revenue. Further, fewer TCN Structures would limit the number of communication points to disseminate information regarding travel alternatives to the public.

- Geographically space the multifunctional TCN Structures to expand Metro's transportation public messaging network and ability to broadcast information to commuters in a variety of ways to further increase Metro's visibility and accessibility for all commuters.
- Maximize efficiency of the congested road network by promoting public awareness of travel alternatives based on geography and time constraints such as alternative routes, carpooling alternatives, and public transportation opportunities.
- Maximize advertising revenue that would be utilized by both Metro and the City to fund new and expanded transportation programs that would further Goal 2 of the Metro Vision 2028 Strategic Plan, by creating a funding source for programs to enhance experiences for all Metro users such as improving security and increasing customer satisfaction.

V. Alternatives

C. Alternative 3: Elimination of All Significant and Unavoidable Impacts Alternative

1. Description of the Alternative

Alternative 3, the Reduced Project—Elimination of All Significant and Unavoidable Impacts Alternative, would eliminate TCN Structures NFF-2, NFF-3, NFF-16, and , NFF-21, as well as eliminate or relocate FF-29 and FF-30 outside of the coastal area of the Palms–Mar Vista–Del Rey Community Plan.⁴ Although the potential relocation of FF-29 and FF-30 is undetermined at this time, the TCN Structures would only be relocated to an alternative Site Location that would not result and significant and unavoidable impacts. The remaining 50 TCN Structures would be implemented as proposed under the Project. . As with the Project, Alternative 3 would provide for an overall reduction in static displays throughout the City. As part of Alternative 3, a take-down program would be implemented, including at least a 2 to 1 square footage take-down ratio of existing static displays. Signage to be removed would include approximately 200 static displays located within the City of Los Angeles.

As with the Project, under Alternative 3 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.

⁴ Note that based on ZIMAS, FF-29 and FF-30 appear to be in the Coastal Zone. Should it be determined that these site locations are not within the Coastal Zone, the potential land use and aesthetic plan policy impacts associated with placement of signs within the coastal area of the Palms–Mar Vista–Del Rey Community Plan area would not occur.

2. Environmental Impacts

a. Aesthetics

(1) Scenic Vistas and Visual Character

As described in Section IV.A Aesthetics of this draft EIR, under the Project it is conservatively concluded that the proposed TCN Structures would result in significant impacts associated with views and visual character at Site Locations NFF-2, NFF-3, NFF-16 and NFF-21. Specifically, five historical resources, including the North Spring Street Bridge (Caltrans Bridge No. 53C0859), Lankershim Depot, the Little Tokyo Historic District, the Japanese Village Plaza, and the Fourth Street Bridge (Caltrans Bridge No. 53C0044) are located in close proximity to these TCN Structures. Under the Project, while the TCN structures would not physically impact the historical resources, the TCN Structures would impede visibility of and thus detract from the character defining features of these five historical resources and result in significant impacts associated with views of and the visual character in the vicinity of these historical resources. Under Alternative 3, six Site Locations including Site Locations NFF-2, NFF-3, NFF-16 and NFF-21 would be eliminated to address these aesthetic impacts related to historical resources. Therefore, Alternative 3 would result in less than significant impacts with respect to scenic vistas and visual character, and such impacts would be less when compared to the significant impacts of the Project.

(2) Consistency with Regulations Regarding Scenic Quality

Alternative 3 would eliminate Site Locations NFF-2, NFF-3, NFF-16, and NFF-21 located in the Central City North, Central City, North Hollywood–Valley Village Community Plans. As such, the visual impacts related to historical resources and associated plan policy inconsistency would be eliminated and would be less than significant under Alternative 3. Further, under Alternative 3, Site Locations FF-29 and FF-30 would be eliminated or relocated outside of the coastal area of the Palms–Mar Vista–Del Rey Community Plan. As such, Alternative 3 would no longer conflict with the coastal area development standard prohibiting off-premise commercial signs in coastal areas and impacts would be less than significant. Overall, impacts would be less than significant and the significant and unavoidable impact of the Project would be eliminated.

(3) Light and Glare

As demonstrated by the detailed light and glare analysis included in Section IV.A Aesthetics and Appendix B of this Draft EIR, potential light and glare impacts associated with implementation of the proposed TCN Structures would be less than significant. As Alternative 3 would eliminate Site Locations NFF-2, NFF-3, NFF-16, NFF-21, as well as

eliminate or relocate Site Locations FF-29 and FF-30 outside of the coastal area of the Palms–Mar Vista–Del Rey Community Plan, impacts to light and glare would be reduced due to the overall reduction in displays. Therefore, Alternative 3 would result in less than significant impacts with respect to light and glare, and such impacts would be overall less when compared to the less than significant impacts of the Project.

b. Air Quality

(1) Construction

As discussed in Section IV.B, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. As with the Project, Alternative 3 would comply with applicable air quality regulations and construction-related daily maximum regional construction emissions (i.e., combined on-site and off-site emissions) would not exceed the SCAQMD daily significance thresholds for VOC, CO, SO_x, PM₁₀, or PM_{2.5}.

Under Alternative 3, construction activities would be reduced in comparison to the Project due to the reduction in development (i.e., a reduction in the total number of TCN Structures). However, the intensity of air emissions and fugitive dust from site preparation and construction activities under Alternative 3 would be similar to the Project on peak construction days because the anticipated construction schedule for each TCN Structure would remain the same as the Project. As such, air emissions during maximum activity days, which is one of the metrics used for measuring impact significance, would be similar to those of the Project. Further, on-site construction activities under Alternative 3 would be located at similar distances from sensitive receptors as the Project. Therefore, Alternative 3 would result in less than significant impacts with respect to construction-related air quality impacts, and such impacts would be similar when compared to the Project's less than significant impacts.

As with the Project, construction of Alternative 3 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.B, Air Quality, of this Draft EIR, the Project would result in less than significant impacts with regard to construction TAC emissions. Overall construction TAC emissions generated by Alternative 3 would be less than those of the Project due to the reduction in total TCN Structures and excavation activities. However, the intensity of diesel particulate emissions associated with heavy equipment operations during grading and excavation activities under Alternative 3 would be similar to the Project on peak construction days because the anticipated construction schedule for each TCN Structure would remain the same as the Project. Thus, impacts due to TAC emissions and the

corresponding individual cancer risk under Alternative 3 would be less than significant and similar when compared to the less than significant impacts of the Project.

(2) Operation

Similar to the Project, Alternative 3 would not generate trips and VMT on a regular basis during operations. Trips would be limited to two vehicles (roundtrips) per day for maintenance activities to cover all proposed TCN Structures under this alternative. Therefore, Alternative 3 would result in similar daily VMT when compared to the Project. Thus, as with the Project, regional and local emissions from Alternative 3 would not exceed any SCAQMD's daily regional or local operational thresholds. Therefore, regional and local operational emissions resulting from Alternative 3 would be less than significant and similar to those of the Project that would be less than significant.

As set forth in Section IV.B, Air Quality, of this Draft EIR, other potential air toxics associated with Project operations include light painting activities and emissions from diesel power equipment associated with maintenance activities. However, these activities are not considered land uses that generate substantial TAC emissions. Overall operation TAC emissions generated by Alternative 3 would be less than those of the Project due to the reduction in total TCN Structures. However, the limited intensity of maintenance activities during operations under Alternative 3 would be similar to the Project on peak operation days because the anticipated operation schedule for each TCN Structure would remain the same as the Project. Therefore, Alternative 3 would not release substantial amounts of TACs. Impacts due to TAC emissions and the corresponding cancer risk under Alternative 3 would be less than significant and similar when compared to the less than significant impacts of the Project.

c. Biological Resources

Alternative 3 would eliminate Site Locations NFF-2, NFF-3, NFF-16, NFF-21, as well as eliminate or relocate Site Locations FF-29 and FF-30 outside of the coastal area of the Palms–Mar Vista–Del Rey Community Plan. Additionally, as with the Project, Alternative 2 would construct the remainder of the 50 Site Locations, and implement a take-down program of existing static displays. As such, Alternative 3 has the potential to affect areas where biological resources and sensitive habitats exist in the vicinity as described in Section IV.C Biological Resources of this Draft EIR. As with the Project, Alternative 3 would have potential impacts associated with the following: five special-status plant species, six federally and/or State-listed wildlife species, and suitable habitat for 10 other special-status wildlife species. Alternative 3 would implement the Project's Mitigation Measures BIO-MM-1 through BIO-MM-4, as applicable to the specific Site Location as described in Section IV.C Biological Resources Further, as TCN Structures FF-29 and FF-30 would potentially cause an impact to candidate, sensitive, or special status species

elimination or relocation of these TCN Structures would reduce impacts. Therefore, Alternative 3 would result in less than significant impacts with mitigation incorporated with respect to impacts to candidate, sensitive, or special status species, and such impacts would be less when compared to the Project's less than significant impacts with mitigation incorporated.

Similar to the Project, Alternative 3 would include areas within the BSA of Site Locations FF-24 and FF-25 where a sensitive vegetation community may occur. Therefore, like the Project, Alternative 3 would implement the Project's Mitigation Measure BIO-MM-1, which includes provisions for placement of exclusion fencing to avoid sensitive vegetation if present. Further, as TCN Structures NFF-2, NFF-3, NFF-16, NFF-21, FF-29, and FF-30 would not cause an impact to sensitive natural communities, elimination or relocation of these TCN Structures would not reduce the impact. Therefore, Alternative 3 would result in less than significant impacts with mitigation incorporated with respect to impacts to sensitive natural communities, and such impacts would be similar when compared to the Project's less than significant impacts with mitigation incorporated.

Similar to the Project, Alternative 3, would include three features potentially subject to USACE, RWQCB, and/or CDFW jurisdiction within the BSA including the LA River, Haskell Creek, and one unnamed concrete-lined channel is within the BSA. Potential short-term indirect impacts to downstream aquatic resources could occur if fill or hazardous material were to spill into the drainages. In addition, Alternative 3 would implement Mitigation Measure BIO-MM-1, which includes provisions for preconstruction surveys, worker awareness training, placement of exclusion fencing to avoid aquatic features, and monitoring of construction activities by a qualified biologist. Further, Alternative 3 eliminates Site Location NFF-2, which under the Project would be located in the vicinity of the LA River, and also eliminates or relocates Site Locations FF-29 and FF-30, which under the Project would be located in the vicinity of the Ballona Wetlands. As such, Alternative 3 would result in less than significant impacts with mitigation incorporated with respect to aquatic resources, and such impacts would be less when compared to the Project's less than significant impacts with mitigation incorporated given the elimination Site Location NFF-2 and elimination or relocation of Site Location FF-29 and FF-30.

As with the Project, under Alternative 3, the LA River could potentially be utilized as a corridor or habitat linkage by wildlife. Like the Project, under Alternative 3, the portion of the LA River where the Site Locations would be located in the vicinity of is an area with commercial and industrial uses. Alternative 3 eliminates Site Location NFF-2, which is located in the vicinity of the LA River. However, wildlife may stray outside of the LA River and closer to Alternative 3 construction or operations. As such, like the Project, Alternative 3 would implement Mitigation Measures BIO-MM-1, BIO-MM-2, and BIO-MM-4, which include numerous provisions that would reduce potential impacts on wildlife migrating through the LA River to less than significant levels. Further, Alternative 3 eliminates Site

Location NFF-2 which under the Project would be located in the vicinity of the LA River, and therefore would lessen the impacts when compared to the Project. As such, Alternative 3 would result in less than significant impacts with mitigation incorporated with respect to impacts to wildlife corridors, and such impacts would be less when compared to the Project's less than significant impacts with mitigation incorporated given the elimination Site Location NFF-2.

Overall, Alternative 3 would result in less than significant impacts with mitigation incorporated with respect to biological resources impacts, and such impacts would be less when compared to the Project's less than significant impacts with mitigation incorporated, given the elimination Site Location NFF-2 and elimination or relocation of Site Locations FF-29 and FF-30.

d. Cultural Resources

(1) Historical Resources

As discussed in Section IV.D, Cultural Resources, of this Draft EIR, the Project would result in significant impacts associated with the visual character and setting of five historical resources, including the North Spring Street Bridge (Caltrans Bridge No. 53C0859), Lankershim Depot, the Little Tokyo Historic District, the Japanese Village Plaza, and the Fourth Street Bridge (Caltrans Bridge No. 53C0044) resulting from the construction of Site Locations NFF-2, NFF-3, NFF-16, and NFF-21. Alternative 3 would eliminate Site Locations NFF-2, NFF-3, NFF-16, NFF-21, as well as eliminate or relocate Site Locations FF-29 and FF-30 outside of the coastal area of the Palms–Mar Vista–Del Rey Community Plan. Additionally, as with the Project, Alternative 3 would construct the remainder of the 50 Site Locations, and implement a take-down program of existing static displays. Therefore, Alternative 3 would remove the four TCN Structures that would create a potential impact to historical resources and would result in less than significant impacts with respect to historical impacts. Overall, under Alternative 3, impacts to historical resources would be less than significant to the significant and unavoidable impacts of the Project would be eliminated.

(2) Archaeological Resources

As with the Project, the TCN Structures proposed under Alternative 3 would be constructed with the use of a drill rig that would drill a hole up to 50 feet in depth on an approximately 10-foot by 10-foot area, depending on soil conditions and size of the digital display. Thus, there may be a potential to encounter unknown archaeological resources that could be present at the Site Locations. Therefore, impacts with regard to archaeological resources are potentially significant. As such, Alternative 3 would implement Mitigation Measure CUL-MM-1, which includes retention of a qualified

archaeologist to implement a Cultural Resource Monitoring and Treatment Plan to address the potential discovery of archaeological resources. Therefore, Alternative 3 would result in less than significant impacts with mitigation incorporated with respect to archaeological resources impacts, and such impacts would be less when compared to the Project's less than significant impacts with mitigation incorporated, given the elimination of at least 4 TCN Structures.

e. Energy

(1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

(a) Construction

Similar to the Project, during construction of Alternative 3, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electric equipment, or other construction activities necessitating electrical power. Similar to the Project, construction activities associated with Alternative 3 would not involve the consumption of natural gas. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Site Locations, construction worker travel to and from the Site Locations, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities, as well as trips associated with the delivery of the TCN Structure materials). However, the energy consumed during construction of Alternative 3 would be reduced compared to the Project due to the reduction in overall TCN Structures. As with the Project, the use of construction equipment/vehicles used during construction of Alternative 3 would incorporate a variety of energy conservation measures to reduce energy usage and additional efficiency requirements under various regulations, such as Title 24 energy efficiency requirements, CALGreen Code, Metro's 2019 CAAP, as well as Metro and City building codes, which may further reduce Project-related consumption.

Therefore, as with the Project, Alternative 3 construction activities would not require energy demand that is wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 3 and slightly less when compared to the less than significant impacts of the Project, given the elimination of at least 4 TCN Structures.

(b) Operation

As with the Project, during operation of Alternative 3, energy would be consumed mainly for lighting and display purposes. Energy would also be consumed during operations related to maintenance activities vehicle trips. Similar to the Project, Alternative

3 would not generate trips and VMT on a regular basis during operations. Trips would be limited to two vehicles (roundtrips) per day for maintenance activities to cover all TCN Structures proposed under this alternative. As such, Alternative 3 would result in slightly less energy consumed during maintenance activities for vehicle trips when compared to the Project. Therefore, as with the Project, operation of Alternative 3 would not involve the wasteful, inefficient, or unnecessary consumption of energy resources. Overall, Alternative 3 would result in less than significant impacts related to energy use during operation, and such impacts would be slightly less than the less than significant impacts of the Project.

(2) Conflict with Plans for Renewable Energy or Energy Efficiency

As with the Project, the energy conservation policies and plans relevant to the Project and Alternative 3 include the California Title 24 energy standards, the 2019 CALGreen Code, Metro's Green Construction Policy, Metro's CAAP, the City of Los Angeles Green Building Code, City of LA Green New Deal, and SCAG's 2020–2045 RTP/SCS. Similarly, these conservation policies would be implemented as part of Alternative 3, Alternative 3 would not conflict with applicable plans for renewable energy or energy efficiency. As with the Project, during construction activities, Alternative 3 would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations reducing unnecessary energy consumption. Therefore, Alternative 3 would not conflict with plans for renewable energy or energy efficiency. Thus, the impacts of Alternative 3 associated with conflict with plans regarding energy would be less than significant and similar to the less than significant impacts of the Project.

f. Geology and Soils

(1) Geologic Hazards

The Site Locations are located within the seismically active region of Southern California. Thus, as with the Project, under Alternative 3 impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, liquefaction, seismically induced settlement, and subsidence, would be similar to those under the Project since such impacts are a function of the Site Locations' underlying geologic conditions. As with the Project, Alternative 3 would implement Project Design Feature GEO-PDF-1 to incorporate the professional recommendations contained in the Geology and Soils Evaluation and associated recommendations set forth in a site location-specific, design-level geologic and geotechnical investigation(s). Further, Alternative 3 would also be subject to all applicable regulations, including the applicable provisions in the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the California Building Code, Metro Rail Design Criteria, the City's General Plan Safety Element, and the Los Angeles Building Code. Lastly, similar to the Project, Alternative 3 would not include uses such as mining operations, deep excavation into the earth, or boring of large areas creating

unstable seismic conditions or stresses in the earth's crust. Overall, given the similar construction methods, construction types, and amount of grading and excavation, Alternative 3 impacts related to geology and soils would result in less than significant impacts with respect to geologic hazards impacts, and such impacts would be less when compared to the Project's less than significant impacts, given the elimination of at least four TCN Structures.

(2) Paleontological Resources

Alternative 3 would eliminate Site Locations NFF-2, NFF-3, NFF-16, NFF-21, as well as eliminate or relocate Site Locations FF-29 and FF-30 outside of the coastal area of the Palms–Mar Vista–Del Rey Community Plan. Additionally, as with the Project, Alternative 3 would construct the remainder of the 50 Site Locations, and implement a take-down program of existing static displays. All TCN Structures proposed under this alternative would be constructed in a similar manner as the Project, including the use of a drill rig that would drill a hole up to 50 feet in depth on an approximately 10-foot by 10-foot area, depending on soil conditions and size of the digital display. Similar to the Project, at several Site Locations under Alternative 3, bedrock may be encountered underlying the alluvial soils at various depths. The type of bedrock that may be encountered varies with the Site Location and includes the Upper Miocene Puente Formation, the Upper Topanga Formation, Marine Sediments, and the Fernando Formation. These bedrock formations can be conducive to preserving vertebrate fossils. Like the Project, under Alternative 3, it is possible that paleontological resources may be encountered during grading and drilling operations within the Site Locations. Therefore, potential impacts to unique paleontological resources would be potentially significant. As such, Alternative 3 would implement Mitigation Measure GEO-MM-1 which requires the development of a site-specific Paleontological Resource Mitigation and Treatment Plan. Therefore, Alternative 3 would result in less than significant impacts with mitigation incorporated with respect to paleontological resources impacts, and such impacts would be less when compared to the Project's less than significant impacts with mitigation incorporated, given the elimination of at least 4TCN Structures.

g. Greenhouse Gas Emissions

As discussed in Section IV.C, Greenhouse Gas Emissions, of this Draft EIR, GHG emissions from a development project are determined in large part by the number of daily vehicle trips generated and associated VMT, as well as by energy consumption from proposed land uses. As previously discussed above, due to the reduction in TCN Structures, the number of daily trips, daily VMT, and energy consumption under Alternative 3 would be reduced compared to the Project. In addition, energy consumption from the proposed land uses would be reduced compared to the Project due to the reduction in TCN Structures. Thus, the amount of GHG emissions generated by Alternative 3 would be less

than the amount generated by the Project. As with the Project, Alternative 3 would be designed to comply with the requirements of the construction protocols required by Metro's Green Construction Policy, the Los Angeles Green Building Code and the CALGreen Code. With compliance with applicable regulations and with implementation of comparable sustainability features as the Project, Alternative 3 would be consistent with the GHG reduction goals and objectives included in adopted State, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 3 would be less than significant and less when compared to the less than significant impacts of the Project.

h. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, during construction of Alternative 3, hazardous materials, such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, would be used and, therefore, would require proper handling and management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases and, subsequently, the exposure of the public to hazardous materials. However, all potentially hazardous materials would be used, stored, and disposed in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use.

With respect to existing conditions, like the Project, Alternative 3, would be located adjacent to freeways and major roadways on Metro-owned properties. The majority of the proposed Site Locations are used primarily for Metro operations which include rail corridors, stations, parking, bus depots, and equipment lots. The primary COCs likely to be encountered at all Site Locations include total petroleum hydrocarbons as gasoline (TPHg), total petroleum hydrocarbons as diesel (TPHd), total petroleum hydrocarbons as oil (TPHo), arsenic, lead, chromium and polynuclear aromatic hydrocarbons (PAHs). Additionally, of the 56 Site Locations proposed under the Project, 20 are also known to contain solvent hydrocarbons (primarily Perchloroethylene [PCE]/TCE [tetrachloroethylene] and breakdown by-products) and gasoline. Lastly, two Site Locations may contain on-site oil wells (Site Locations FF-4 and NFF-21) and two Site Locations may contain on-site USTs (NFF-3 and NFF-18). Accordingly, like the Project, Alternative 3 would implement the Project's Mitigation Measures HAZ-MM-1 through HAZ-MM-3 to reduce impacts associated with contaminated soil and soil gas, as well as potential onsite oil wells and USTs to a less than significant level. Additionally, the elimination of NFF-3 and NFF-21 would result in the reduction of a Site Location with a potential onsite UST and a Site Location with a potential on-site oil well. Therefore, Alternative 3 would result in less than significant impacts with mitigation incorporated with respect to construction-related hazards and hazardous materials impacts, and such impacts would be less when compared to the Project's less

than significant impacts with mitigation incorporated, given the elimination of at least four TCN Structures.

(2) Operation

Operation of Alternative 3 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. Overall, potential hazards impacts would be less than significant and less than the less than significant impacts of the Project as a result of elimination of as least four TCN Structures.

4. Land Use and Planning

Alternative 3 would eliminate Site Locations NFF-2, NFF-3, NFF-16, and NFF-21 located in the Central City North, Central City, North Hollywood–Valley Village Community Plans. As such, the inconsistency with the polices protecting historic resources found in these three community plans would be eliminated as part of this alternative. Additionally, Alternative 3 would no longer substantially conflict with the General Plan Conservation Element's applicable goals, objectives, and policies set forth in the Conservation Element adopted for the purpose of avoiding or mitigating an environmental effect with regard to historic resources. Therefore, with the elimination of Site Locations NFF-2, NFF-3, NFF-16, and NFF-21, land use impacts relative to the substantial conflict with historical resources policies would be less than significant under Alternative 3 and the significant and unavoidable impact under the Project would be eliminated.

Under the Project, Site Locations FF-29 and FF-30 would be inconsistent with the Palms–Mar Vista–Del Rey Community Plan coastal area development standard prohibiting off-premise commercial signs in coastal areas since the proposed TCN Program would provide for off-premises advertising to fund new and expanded transportation programs, in addition to their functions to improve the transportation system and provide communication during emergency events. Under Alternative 3, Site Locations FF-29 and FF-30 be eliminated or relocated outside of the coastal area of the Palms–Mar Vista–Del Rey Community Plan. As such, Alternative 3 would eliminate the conflict with the coastal area development standards set forth in the Palms–Mar Vista–Del Rey Community Plan relative to the placement of off-site commercial advertising in coastal areas. Impacts would be less than significant and the significant and unavoidable impact of the Project would be eliminated.

Overall, Alternative 3 would not cause an overall conflict with or impede implementation of the Coastal Act, Vision Plan, or General Plan or Community Plans, or the environmental policies in other applicable plans adopted for the purpose of avoiding or mitigating an environmental effect. Further, Alternative 3 would eliminate the significant and unavoidable impact for land use relative to the substantial conflict with historical resources policies impact relative to the conflict with applicable goals, objectives, and policies set forth in the Palms–Mar Vista–Del Rey Community Plan relative to the placement of off-site commercial advertising in coastal areas. Therefore, As such, impacts related to conflicts with applicable plans, policies, and regulations would be less than significant under Alternative 3 and the significant and unavoidable land use impact of the Project would be eliminated.

j. Noise

(1) Noise

(a) Construction

Under Alternative 3, construction activities would be reduced in comparison to the Project due to the reduction in development (i.e. a reduction in total number of TCN Structures). However, the types of construction activities under Alternative 3 would be similar to the Project for the construction of a single TCN Structure and take-down of a single static display. As with the Project, construction of Alternative 3 would generate noise from the use of heavy-duty construction equipment, as well as from haul truck and construction worker trips. Under Alternative 3, on- and off-site construction activities and the associated construction noise levels would be expected to be similar to that of the Project during maximum activity days during the excavation phases (i.e., there would be no change to the intensity for days in which the maximum construction activity is required). As such, noise levels during maximum activity days, which is one metric used for measuring impact significance, would be similar to those of the Project. As with the Project, Alternative 3 would implement Project Design Feature NOI-PDF-1 for construction of the TCN Structures as well as take-down of the existing static displays. Further, Mitigation Measure NOI-MM-1 and NOI-MM-2 would minimize construction noise for the TCN Structures. Additionally, Mitigation Measure NOI-MM-3, would minimize construction noise during take-down of the existing static displays. Therefore, Alternative 3 would result in less than significant impacts with mitigation incorporated with respect to construction-related noise impacts, and such impacts would be similar when compared to the Project's less than significant impacts with mitigation incorporated.

(b) Operation

As discussed in Section IV.F, Noise, of this Draft EIR, Project operations would not generate vehicle trips on a daily basis and would occur occasionally for maintenance

activities on an as-needed basis. Therefore, like the Project, Alternative 3 is not anticipated to generate any measurable on-site or off-site noise sources. Therefore, Alternative 3 operations would not result in the generation of a substantial permanent increase in ambient noise levels in the vicinity of the Site Locations in excess of standards established in the City's general plan or noise ordinance, or applicable standards of other agencies. Therefore, Alternative 3's operational noise impacts from on- and off-site sources would be less than significant and similar when compared to the less than significant impacts of the Project.

(2) Vibration

(a) Construction

As noted above, under Alternative 3, construction activities would be reduced in comparison to the Project due to the reduction in development (i.e. a reduction in total number of TCN Structures). However, the types of construction activities under Alternative 3 would be substantially similar to the Project for the construction of a single TCN Structure and take-down of a single static display. As with the Project, construction of Alternative 3 would generate ground-borne construction vibration during drilling for the structure foundation and the trenching and site excavation/grading activities when heavy construction equipment, such as drill rigs and loaded trucks, would be used. As with the Project, Alternative 3, would implement Mitigation Measure NOI-MM-2 which would require construction of TCN Structure NFF-20 to be complete prior to the occupancy of the adjacent future residential building, or alternatively, Mitigation Measure NOI-MM-4, if construction occurs after the adjacent residential building is constructed and occupied. Further, as with the Project, Alternative 3 would implement Mitigation Measure NOI-MM-4 to minimize construction vibration impacts (human annoyance) on the existing sensitive receptor, located 30 feet from Site Location FF-33. Further, under Alternative 3, impacts related to on-site and off-site construction vibration (human annoyance) for the construction of all other TCN Structures would be less than significant. Vibration impacts (pursuant to the significance criteria for building damage) during construction of the Alternative 3 would also be less than significant. Therefore, although the overall amount and duration of construction activities (including excavation) would be reduced under Alternative 3, on- and off-site construction activities and the associated construction on- and off-site vibration levels would be expected to be similar to those of the Project as construction vibration impacts are evaluated based on the maximum (peak) day vibration levels generated by each type of construction equipment (i.e., there would be no change to the intensity for days in which the maximum construction activity is required). In addition, the removal of the existing static displays would not require the use of large earthmoving equipment. Therefore, vibration associated with the existing static displays removal (e.g., mobile crane, container truck and small backhoe) would be well below the human annoyance significance threshold. Therefore, Alternative 3 would result in less than significant impacts with mitigation incorporated with respect to construction-related vibration impacts, and such impacts would

be similar when compared to the Project's less than significant impacts with mitigation incorporated.

(b) Operation

As described above, Alternative 3 operations would not generate any significant on-site and off-site vibration sources. Therefore, operation of Alternative 3 would not result in the generation of excessive ground-borne vibration levels that would be perceptible in the vicinity of the Project Site. As such, vibration impacts associated with operation of the Alternative 3 would be less than significant and similar when compared to the less than significant impacts of the Project.

k. Transportation

Alternative 3 would eliminate Site Locations NFF-2, NFF-3, NFF-16, NFF-21, as well as eliminate or relocate Site Locations FF-29 and FF-30 outside of the coastal area of the Palms–Mar Vista–Del Rey Community Plan. Additionally, as with the Project, Alternative 3 would construct the remainder of the 50 Site Locations, and implement a take-down program of existing static displays. As such, the plans, policies, and programs applicable to the Project would also apply to Alternative 3. As with the Project, this alternative would be consistent with Metro's 2028 Vision Plan by improving the County's overall transit network and assets and helping to deliver outstanding trip experiences for all users of the transportation system. Additionally, Alternative 3 would support the goals of the 2020–2045 RTP/SCS including increasing the travel choices within the transportation system by creating advertising that would be utilized by both Metro and the City to fund new and expanded transportation programs. Further, Alternative 3 would be consistent with the City of Los Angeles' Mobility Plan by improving transit access and service to major regional destinations, job centers, and inter-modal facilities as the TCN Structures would be equipped with Metro's RIITS, which provides comprehensive, timely, and real-time information among freeway, traffic, transit, and emergency systems across various agencies including local and regional transit agencies, to improve traffic and transportation systems, and to disseminate information regarding roadway improvements and during emergency events. As such, Alternative 3 would support these transportation plans for the same reasons as the Project, and therefore, would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be less than significant and similar to the less than significant impact of the Project

The TCN Program under the Project was found to operate similarly to the Commercial Electronic Variable Message Signs (CEVMS) in the studies reviewed. Thus, it is anticipated that driver fixation on the TCN Structures would similarly be below the NHTSA threshold for dangerous driver distraction of 2.0 seconds. Thus, this same determination would apply to Alternative 3.

Furthermore, as with the Project, as part of the TCN Structures proposed under Alternative 3, operation, motion and flashing images would be prohibited and transitions between messages would be instant without using a black screen between messages. Light emitted by the TCN Structures would also be adjustable throughout the day and night, ensuring that the signs would not cause excessive glare on nearby roadways. The signs would also be positioned to focus on the intended roadways and minimize visibility from adjacent streets. Alternative 3 would also be consistent with regulations regarding allowable sign luminance, shadows, and glare, and specifically with CVC 21466.5. Additionally, as with the Project, the Freeway Facing TCN Structures were reviewed for consistency with Caltrans guidelines and all of the signs were found to be compliant with the guidelines for digital signage adjacent to a freeway. Also, the non-freeway facing signs would operate based on established industry standards for refresh rate. As such, impacts associated with the substantial increase in hazards or incompatible uses during the operation of the Alternative 3 would be less than significant and less when compared to the less than significant impacts of the Project, given the elimination of at least 4 TCN Structures.

I. Tribal Cultural Resources

Alternative 3 would eliminate Site Locations NFF-2, NFF-3, NFF-16, NFF-21, as well as eliminate or relocate Site Locations FF-29 and FF-30 outside of the coastal area of the Palms–Mar Vista–Del Rey Community Plan. Additionally, as with the Project, Alternative 3 would construct the remainder of the 50 Site Locations, and implement a take-down program of existing static displays. As with the Project, the proposed Site Locations under Alternative 3 may contain known or reasonably foreseeable tribal cultural resources determined by Metro to be significant pursuant to criteria set forth in IPRC Section 5024.1(c) (i.e., tribal cultural resources). As such, the Alternative 3 may cause a substantial adverse change in the significance of a known tribal cultural resource with cultural value to a California Native American tribe or that is listed or eligible for listing in the California Register or in a local register. Therefore, as with the Project, impacts related to tribal cultural resources would be less than significant with the implementation of Mitigation Measures MM-TCR-1 through MM-TCR-3. Therefore, Alternative 3 would result in less than significant impacts with mitigation incorporated with respect to tribal cultural resources impacts, and such impacts would be less when compared to the Project's less than significant impacts with mitigation incorporated, given the elimination of at least four TCN Structures.

m. Utilities and Service Systems

(1) Energy Infrastructure

(a) Construction

Alternative 3 would eliminate Site Locations NFF-2, NFF-3, NFF-16, and NFF-21, as well as eliminate or relocate Site Locations FF-29 and FF-30 outside of the coastal area of the Palms–Mar Vista–Del Rey Community Plan. Additionally, as with the Project, Alternative 3 would construct the remainder of the 50 Site Locations, and implement a take-down program of existing static displays. Construction activities at the Site Locations would require minimal electricity for lighting and equipment. Furthermore, short-term and intermittent energy usage during construction is generally far less than ongoing usage during a project's operational phase; thus, operational demands are the primary means for analyzing infrastructure capacity. Overall, demolition and construction activities would require minimal electricity consumption as compared to the existing energy usage for the existing static displays.

As previously noted, the energy consumed by Alternative 3 would be slightly reduced compared to the Project due to the reduction in the overall amount of construction activities related to the elimination of at least four TCN Structures. Therefore, impacts on infrastructure capacity associated with short-term construction activities under Alternative 3 would be less than significant and less when compared to the less than significant impacts of the Project, given the reduction of overall TCN Structures.

(b) Operation

The Project is anticipated to result in a net new on-site demand for electricity totaling approximately 2,288,691 kWh per year when accounting for removal of the existing static displays. Based on LADWP's 2017 Power Strategic Long-Term Resources Plan, LADWP forecasts that its total energy sales in the 2025-2026 fiscal year (the Project's buildout year) would be 23,537 GWh of electricity.^{5,6} As such, the Project-related annual electricity consumption of 3,288,690 kWh per year would represent less than 0.1 percent of LADWP's projected sales in 2025. In comparison to the LADWP power grid base peak load of 5,820 MW in 2017, the Project Site net energy demand would represent 0.012 percent of the LADWP base peak load conditions. This demand would not significantly affect the ability of LADWP to accommodate peak electrical demands. As Alternative 3 would construct a reduced number of TCN Structures when compared to the Project, impacts would be

⁵ LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.

⁶ LADWP, 2017 Power Strategic Long-Term Resources Plan, Appendix A, Table A-1, December 2017.

reduced when compared to the Project. Furthermore, as with the Project, Alternative 3 would include the installation of any necessary new lines, connections, and upgrades required by LADWP to ensure adequate service to the Site Locations. Therefore, LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support Alternative 3's operational electricity demand. Based on the above, operation of the Alternative 3 would not result in an increase in demand for electricity that exceeds the existing available supply or distribution infrastructure capabilities, such that there would be a need for new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. As such, Alternative 3 would result in less than significant impacts related to energy infrastructure during operation, and such impacts would be slightly less than the less than significant impacts of the Project, given the elimination of at least 4 TCN Structures.

3. Comparison of Impacts

Based on the analysis above, Alternative 3 would avoid the Project's significant and unavoidable historic resources impacts and related aesthetics and land use consistency impact. Alternative 3 would also avoid the Project's significant and unavoidable land use and aesthetic plan policy impacts relative to conflicting with the applicable development standards set forth in the Palms–Mar Vista–Del Rey Community Plan due to the placement of off-site commercial advertising in coastal areas. Further, Alternative 3 would also reduce the overall duration of construction activities for the TCN Program. In addition, Alternative 3 would reduce several of the less than significant impacts and less than significant impacts with mitigation associated with the Project (e.g., biological resources, archaeological resources, energy, geology and soils, greenhouse gases, paleontological resources, hazards and hazardous materials, transportation, tribal cultural resources, and energy infrastructure). All other impacts would be similar to those of the Project.

4. Relationship of the Alternative to Project Objectives

Alternative 3 would eliminate Site Locations NFF-2, NFF-3, NFF-16, NFF-21, as well as eliminate or relocate Site Locations FF-29 and FF-30 outside of the coastal area of the Palms–Mar Vista–Del Rey Community Plan. Additionally, as with the Project, Alternative 3 would construct the remainder of the 50 Site Locations, and implement a take-down program of existing static displays. Additionally, as with the proposed Project, Under Alternative 3, the City would establish a Zoning Ordinance that would provide a mechanism to review and approve the TCN Structures citywide.

As discussed above, the underlying purpose of the Project is to provide a network of 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. Alternative 3 would meet the underlying purpose of the Project, but to a lesser extent than the Project due to the reduction in TCN Structures.

Regarding the Project objectives, Alternative 3 would meet the following Project objectives as effectively as the Project:

- Incorporate features for real-time data collection to aid in traffic signal timing, micro-transit data, and Metro vanpool on-demand services.
- Improve public safety by notifying the public of roadway improvements, road hazards, Earthquake Early Warning System notifications, Amber Alerts, and emergency situations.
- Implement Goal 4 of the Metro Vision 2028 Strategic Plan by creating an avenue for regional collaboration and comprehensive, timely, and real-time information sharing across government agencies to regionally improve traffic and transportation systems.
- Reduce overall square footage of existing static off-premise displays within the City of Los Angeles.
- Locate the TCN Structures at sites, elevations, and angles that would not increase distraction to motorists while still efficiently relaying information to commuters.

Alternative 3 would also meet the following Project objectives, although it would not do so as effectively as the Project due to the reduced number of TCN Structures under this alternative. Specifically, under Alternative 3 fewer TCN Structures would limit the number of advertisements, thus limiting possible revenue. Further, fewer TCN Structures would limit the number of communication points disseminate information regarding travel alternatives to the public.

- Geographically space the multifunctional TCN Structures to expand Metro's transportation public messaging network and ability to broadcast information to commuters in a variety of ways to further increase Metro's visibility and accessibility for all commuters.
- Maximize efficiency of the congested road network by promoting public awareness of travel alternatives based on geography and time constraints such

as alternative routes, carpooling alternatives, and public transportation opportunities.

- Maximize advertising revenue that would be utilized by both Metro and the City to fund new and expanded transportation programs that would further Goal 2 of the Metro Vision 2028 Strategic Plan, by creating a funding source for programs to enhance experiences for all Metro users such as improving security and increasing customer satisfaction.

V. Alternatives

D. Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should it be determined that the No Project Alternative, is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives.

With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible alternatives includes Alternative 1, the No Project Alternative; Alternative 2, Elimination of Impacts Relating to Historical Resources Alternative; and Alternative 3, Reduction of Non-Freeway Facing TCN Structures Alternative. Table V-2 on page V-7 provides a comparative summary of the environmental impacts anticipated under each alternative with the environmental impacts associated with the Project. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to “avoid or substantially lessen one or more of the significant effects” of the Project.

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project Alternative would avoid all of the Project’s significant environmental impacts. In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that Alternative 3, Elimination of All Significant and Unavoidable Impacts Alternative, would be the Environmentally Superior Alternative. As described above and summarized in Table V-1 on page V-4, Alternative 3 would eliminate Site Locations NFF-2, NFF-3, NFF-16, NFF-21, as well as eliminate or relocate Site Locations FF-29 and FF-30 outside of the coastal area of the Palms–Mar Vista–Del Rey Community Plan. Additionally, as with the Project, Alternative 3 would construct the remainder of the 50 Site Locations, and implement a take-down program of existing static displays. Overall, Alternative 3 would avoid the Project’s significant and unavoidable historic resources impacts and related aesthetics and land use consistency impacts. Additionally, Alternative 3 would also avoid the Project’s significant and unavoidable land use and aesthetic impact relative to conflicting with the applicable development standards set forth in the Palms–Mar Vista–Del Rey Community Plan due to the placement of off-site commercial advertising in coastal areas. Alternative 3 would also reduce the overall duration of construction activities for the TCN Program more than the Project and slightly more than Alternative 2. In

addition, Alternative 3 would reduce several of the less than significant impacts and less than significant impacts with mitigation associated with the Project (e.g., biological resources, historic resources, archaeological resources, energy, geology and soils, paleontological resources, greenhouse gases, hazards and hazardous materials, transportation, tribal cultural resources, and energy infrastructure). All other impacts would be similar to those of the Project. Thus, of the range of alternatives analyzed, Alternative 3, Elimination of All Significant and Unavoidable Impacts Alternative, would be the Environmentally Superior Alternative.