

I. Executive Summary



I. Executive Summary

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15123, this section of this Draft Environmental Impact Report (EIR) contains a brief summary of the proposed Transportation Communication Network (TCN) Program (Project or TCN Program) and its potential environmental effects. More detailed information regarding the Project and its potential environmental effects is provided in the following sections of this Draft EIR. Also included in this section is an overview of the purpose and focus of this Draft EIR, a description of the organization of this Draft EIR, a general description of the Project, a general description of areas of controversy, a description of the public review process for this Draft EIR, a list of the Project design features and mitigation measures to be implemented as part of the Project, and a summary of the alternatives to the Project evaluated in this Draft EIR, including identification of the Environmentally Superior Alternative.

1. Purpose of this Draft EIR

As described in Section 15121 of the CEQA Guidelines, an EIR is an informational document that will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. Therefore, the purpose of this Draft EIR is to focus the discussion on the Project's potential environmental effects that the Los Angeles County Metropolitan Transportation Authority (Metro), as the Lead Agency, has determined to be, or potentially may be significant. Feasible mitigation measures are recommended, when applicable, that could reduce or avoid the Project's significant environmental impacts.

This Draft EIR serves as the environmental document for all actions associated with the Project. This Draft EIR is a "Project EIR," as defined by Section 15161 of the CEQA Guidelines. Furthermore, this Draft EIR complies with Section 15064 of the CEQA Guidelines, which discusses determining the significance of the environmental effects caused by a project.

2. Draft EIR Focus and Effects Found Not to Be Significant

In accordance with Section 15128 of the CEQA Guidelines, an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the Draft EIR. An Initial Study was prepared for the Project and a Notice of Preparation (NOP) was distributed for public comment to the State Clearinghouse, Governor's Office of Planning and Research, responsible agencies, and other interested parties on April 18, 2022, for a 45-day review period. In addition, public scoping meetings for the Project were held on May 19, 2022 and May 21, 2022. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. Metro determined through the Initial Study the potential for significant impacts in the following environmental issue areas:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use and Planning
- Noise
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems (Electric Power Infrastructure)

Metro determined through the Initial Study that the Project would not have the potential to cause significant impacts related to scenic resources within a state scenic highway; agriculture and forestry resources; odors; conflicts with local policies or

ordinances protecting biological resources; conflicts with habitat conservation plans; human remains; soils incapable of supporting septic tanks; routine transport, use, or disposal of hazardous materials; airport or airstrip-related hazards; an emergency response plan or emergency evacuation plan; wildland fires; hydrology and water quality; physical division of an established community; mineral resources; airport or airstrip-related noise; population and housing; public services; recreation; vehicle miles traveled; inadequate emergency access; water infrastructure and supplies; wastewater infrastructure and treatment capacity; stormwater drainage; natural gas infrastructure; telecommunications infrastructure; solid waste; and wildfire. Therefore, these topics are not further analyzed in this Draft EIR. The Initial Study, which is included in Appendix A of this Draft EIR, demonstrates that no significant impacts would occur relative to these environmental areas.

3. Draft EIR Organization

This Draft EIR is comprised of the following sections:

- I. **Executive Summary.** This section describes the purpose of this Draft EIR, Draft EIR focus and effects found not to be significant, Draft EIR organization, thresholds of significance, existing conditions, Project summary, areas of controversy, public review process, summary of environmental impacts, Project design features, mitigation measures, and summary of alternatives.
- II. **Project Description.** This section describes the Project location, existing conditions, Project objectives, characteristics of the Project, and requested permits and approvals.
- III. **Environmental Setting.** This section contains a description of the existing physical and built environment and a list of related projects in the vicinity of the Project Site.
- IV. **Environmental Impact Analysis.** This section contains the environmental setting, Project and cumulative impact analyses, mitigation measures (where necessary), and conclusions regarding the level of significance after mitigation for each of the following environmental issues: air quality; biological resources; cultural resources; energy; geology and soils; greenhouse gas (GHG) emissions; hazards and hazardous materials; land use and planning; noise; transportation; tribal cultural resources; and utilities and service systems (energy infrastructure).
- V. **Alternatives.** This section provides an analysis of a reasonable range of alternatives to the Project, including: Alternative 1, the No Project Alternative; Alternative 2, Elimination of Impacts Relating to Historical Resources

Alternative; and Alternative 3, Elimination of All Significant and Unavoidable Impacts Alternative.

- VI. Other CEQA Considerations.** This section provides a discussion of significant and unavoidable impacts that would result from the Project and the reasons why the Project is being proposed notwithstanding the significant and unavoidable impacts. An analysis of the significant irreversible changes in the environment and potential secondary effects that would result from the Project is also included. This section also analyzes potential growth-inducing impacts of the Project and potential secondary effects caused by the implementation of the mitigation measures for the Project. Lastly, a summary of the possible effects of the Project that were determined not to be significant within the Initial Study is provided.
- VII. References.** This section lists the references and sources used in the preparation of this Draft EIR.
- VIII. Acronyms and Abbreviations.** This section provides a list of acronyms and abbreviations used in this Draft EIR.
- IX. List of Preparers.** This section lists the persons, public agencies, and organizations that were consulted or contributed to the preparation of this Draft EIR.

This Draft EIR includes the following appendices to support the environmental analyses prepared for the Project:

- Appendix A Initial Study, NOP (Notice of Preparation), and NOP Comment Letters
 - Appendix A.1 Initial Study
 - Appendix A.2 Notice of Preparation (NOP)
 - Appendix A.3 NOP Comment Letters
- Appendix B Metro TCN Lighting Study
- Appendix C Air Quality and Greenhouse Gas Emissions
 - Appendix C.1 Air Quality and Greenhouse Gas Emissions Methodology
 - Appendix C.2 Air Quality Worksheet and Modeling Output Files
 - Appendix C.3 Greenhouse Gas Worksheets and Modeling Output Files

- Appendix D Biological Resources Technical Report
- Appendix E Historical Resource Technical Study
- Appendix F Energy Calculations
- Appendix G Geology and Soils Evaluation
- Appendix H Hazards Technical Report
- Appendix I Land Use Plans Consistency Analysis Tables
- Appendix J Noise Calculation Worksheets
- Appendix K Transportation and Traffic Safety Review
- Appendix L Tribal Cultural Resources
 - Appendix L.1 Tribal Cultural Resources Report
 - Appendix L.2 AB 52 Notification Letters and Delivery Confirmations

4. Thresholds of Significance

Throughout this Draft EIR, the thresholds contained in Appendix G of the CEQA Guidelines (Appendix G) are used.

5. Project Site Location and Existing Conditions

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

The Zoning Ordinance enabling the implementation of the TCN Program would apply solely to the 56 proposed Site Locations for the TCN Structures and any locations for associated sign takedowns. The Site Locations are dispersed throughout the City along freeways and major streets. The City has an approximate land area of 478 square miles (297,600 acres) with a population of nearly four million residents in 2020. The City lies within Los Angeles County which encompasses 4,000 square miles, 88 incorporated cities, and more than 10 million residents.¹ The City is divided into 15 City Council Districts and 35 Community Plan Areas. More than 87 percent of the City is developed with urban uses.

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

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

6. Description of the Proposed Project

As described in Section II, Project Description, of this Draft EIR, Metro proposes to implement the TCN Program, which would provide a network of TCN Structures that would incorporate intelligent technology components to promote roadway efficiency, improve public safety, increase communication, and provide for outdoor advertising that would be used to fund new and expanded transportation programs consistent with the goals of the Metro Vision 2028 Plan. Implementation of the Project would include the installation of up to 34 Freeway-Facing (FF) TCN Structures and 22 Non-Freeway Facing (NFF) TCN Structures, all on Metro-owned property. The total maximum amount of digital signage

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

associated with the TCN Structures would be up to approximately 55,000 square feet. As part of TCN Program, a take-down component would be implemented including the removal of at least 110,000 square feet (2 to 1 square footage take-down ratio) of existing static displays. Signage to be removed would include, at a minimum, approximately 200 static displays located within the City. The City would establish a Zoning Ordinance that would provide a mechanism to review and approve the TCN Structures citywide. The Zoning Ordinance would regulate the location, operation, design, take-down program and community benefits of the TCN Structures. The Zoning Ordinance would also impose digital display and illumination standards to support the TCN Structures, including but not limited to, a maximum of a eight second refresh rate for digital displays and a maximum of up to 6,000 candelas during daytime operation and 300 candelas during nighttime operation of the digital displays. A more detailed description of the TCN Program components is provided in Section II, Project Description, of this Draft EIR.

7. Areas of Controversy

Based on the NOP comment letters provided in Appendix A of this Draft EIR, issues known to be of concern include, but are not limited to, Project impacts associated with aesthetics, biological resources, and transportation hazards. Refer to Appendix A of this Draft EIR for copies of the NOP comment letters. Potential areas of controversy and issues of concern may also include those environmental issue areas where the potential for a significant and unavoidable impact has been identified. As discussed below, these areas include aesthetics, historical resources, and consistency with land use plans.

8. Public Review Process

The City prepared an Initial Study and circulated an NOP for public comment to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties on April 18, 2022, for a 30-day review period. In addition, public scoping meetings for the Project were held on May 19, 2022 and May 21, 2022. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft EIR.

This Draft EIR is being circulated for a 45-day public comment period. Public meetings regarding the Draft EIR will occur on October 6, and October 7, 2022. Following the public comment period, a Final EIR will be prepared that will include responses to the comments raised regarding this Draft EIR.

9. Summary of Environmental Impacts

Table I-1 on page I-9 provides a summary of the environmental impacts of the Project evaluated in this Draft EIR. Based on the analysis in Section IV, Environmental

Impact Analysis, of this Draft EIR, implementation of the Project would result in significant and unavoidable impacts that cannot be feasibly mitigated impacts with respect to aesthetics, historical resources, and consistency with land use plan policies.

**Table I-1
Summary of Impacts Under the Project**

Environmental Issue	Project Impact
A. AESTHETICS	
Scenic Vistas	Significant and Unavoidable
Conflict with Applicable Plans and Other Regulations Governing Scenic Quality/Visual Character	Significant and Unavoidable
Substantial Light or Glare	Less Than Significant
B. AIR QUALITY	
Construction	
<i>Regional Emissions</i>	Less Than Significant
<i>Localized Emissions</i>	Less Than Significant
<i>Toxic Air Contaminants</i>	Less Than Significant
Operation	
<i>Regional Emissions</i>	Less Than Significant
<i>Localized Emissions</i>	Less Than Significant
<i>Toxic Air Contaminants</i>	Less Than Significant
C. BIOLOGICAL RESOURCES	
Candidate, Sensitive, or Special Status Species	Less Than Significant w/ Mitigation
Sensitive Natural Communities	Less Than Significant w/ Mitigation
Wetlands	Less Than Significant w/ Mitigation
Wildlife Corridors and Habitat Linkages	Less Than Significant w/ Mitigation
D. CULTURAL RESOURCES	
Historical Resources	Significant and Unavoidable
Archaeological Resources	Less Than Significant w/ Mitigation
E. ENERGY	
Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Conflict with Plans for Renewable Energy or Energy Efficiency	Less Than Significant
F. GEOLOGY AND SOILS	
Geologic Hazards	Less Than Significant
Paleontological Resources	Less Than Significant w/ Mitigation
G. GREENHOUSE GAS EMISSIONS	
	Less Than Significant
H. HAZARDS AND HAZARDOUS MATERIALS	
Construction	Less Than Significant w/ Mitigation
Operation	Less Than Significant
I. LAND USE AND PLANNING	
	Significant and Unavoidable
J. NOISE	
Construction	

Table I-1 (Continued)
Summary of Impacts Under the Project

Environmental Issue	Project Impact
<i>On-Site Noise</i>	Less Than Significant w/ Mitigation
<i>Off-Site Noise</i>	Less Than Significant
<i>On-Site Vibration (Building Damage)</i>	Less Than Significant
<i>On-Site Vibration (Human Annoyance)</i>	Less Than Significant w/ Mitigation
<i>Off-Site Vibration (Building Damage)</i>	Less Than Significant
<i>Off-Site Vibration (Human Annoyance)</i>	Less Than Significant
Operation	
<i>On-Site Noise</i>	Less Than Significant
<i>Off-Site Noise</i>	Less Than Significant
<i>Vibration</i>	Less Than Significant
K. TRANSPORTATION	
Conflict with Plans	Less Than Significant
Freeway Safety Analysis	Less Than Significant
L. TRIBAL CULTURAL RESOURCES	Less Than Significant w/ Mitigation
M. UTILITIES AND SERVICE SYSTEMS	
Electric Power Infrastructure	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<hr/> <i>Source: Eyestone Environmental, 2022.</i>	

10. Project Design Features

The following Project design features would be implemented as part of the Project:

a. Geology and Soils

Project Design Feature GEO-PDF-1: All development activities conducted on the Site Locations will 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) approved by the Metro Capital Engineering Group and/or the Los Angeles Department of Building and Safety (LADBS), provided such recommendations meet and/or surpass relevant state and City laws, ordinances, Code requirements, and MRDC requirements, California Geological Survey's Special Publication 117A and the City's Building Code, as applicable. Such professional recommendations include site-specific subsurface exploration and laboratory testing, foundation systems that are specific

to the geologic materials encountered at each individual site, and prohibition of the use of fill materials to support foundation systems.

b. Noise

Project Design Feature NOI-PDF-1: Power construction equipment (including combustion engines), fixed or mobile, will be equipped with state-of-the-art noise shielding and muffling devices (consistent with manufacturers' standards). All equipment will be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.

11. Mitigation Measures

The following mitigation measures would be implemented as part of the Project:

a. Biological Resources

Mitigation Measure BIO-MM-1 Implement Biological Resource Protection Measures during Construction (All Site Locations and takedown locations of existing static displays). The following BMPs shall be implemented during construction to minimize direct and indirect impacts on biological resources and special-status species:

- Prior to the commencement of construction, a Project biologist (a person with, at minimum, a bachelor's degree in biology, ecology, or a related environmental science; greater than five years of experience and knowledge of natural history, habitat affinities, and id of flora and fauna species; and knowledge of all relevant federal, state, and local laws governing biological resources, including CDFW qualifications for field surveyors)) shall be designated to be responsible for overseeing compliance with protective measures for biological resources during vegetation clearing and work activities within and adjacent to areas of native habitat. The Project biologist will be familiar with the local habitats, plants, and wildlife and maintain communications with the contractor on issues relating to biological resources and compliance with applicable environmental requirements. The Project biologist may designate other qualified biologists or biological monitors to help oversee Project compliance or conduct preconstruction surveys for special-status species. These biologists will have familiarity with the species for which they would be conducting preconstruction surveys or monitoring construction activities.
- The Project biologist or designated qualified biologist shall review final plans; designate areas that need temporary fencing (e.g., ESA

fencing); and monitor construction activities within and adjacent to areas with native vegetation communities, regulated aquatic features, or special-status plant and wildlife species. The qualified biologist shall monitor compliance with applicable environmental requirements during construction activities within designated areas during critical times, such as initial ground-disturbing activities (fencing to protect native species). The qualified biologist shall check construction barriers or exclusion fencing and provide corrective measures to the contractor to ensure the barriers or fencing are maintained throughout construction. The qualified biologist shall have the authority to stop work if a federally or state-listed species is encountered within the Project footprint during construction. Construction activities shall cease until the Project biologist or qualified biologist determines that the animal will not be harmed or that it has left the construction area on its own. The Project biologist shall notify Metro, and Metro shall notify the appropriate regulatory agency within 24 hours of sighting of a federally or State-listed species.

- Prior to the start of construction, all Project personnel and contractors who will be on the Site Locations during construction shall complete mandatory training conducted by the Project biologist or a designated qualified biologist. Any new Project personnel or contractors that start after the initiation of construction shall also be required to complete the mandatory Worker Environmental Awareness Program training before they commence with work. The training shall advise workers of potential impacts on special-status vegetation communities and special-status species and the potential penalties for impacts on such vegetation communities and species. At a minimum, the training shall include the following topics: (1) occurrences of special-status species and special-status vegetation communities within the Site Location footprints (including vegetation communities subject to USACE, CDFW, and RWQCB jurisdiction); (2) the purpose for resource protection; (3) sensitivity of special-status species to human activities; (4) protective measures to be implemented in the field, including strictly limiting activities, vehicles, equipment, and construction materials to the fenced areas to avoid special-status resource areas in the field (i.e., avoided areas delineated on maps or in the BSA by fencing); (5) environmentally responsible construction practices; (6) the protocol to resolve conflicts that may arise at any time during the construction process; (7) reporting requirements and procedures to follow should a special-status species be encountered during construction; and (8) Avoidance Measures designed to reduce the impacts on special-status species.

- The training program will include color photos of special-status species and special-status vegetation communities. Following the education program, the photos will be made available to the contractor. Photos of the habitat in which special-status species are found will be posted on site. The contractor shall provide Metro with evidence of the employee training (e.g., a sign-in sheet) on request. Project personnel and contractors shall be instructed to immediately notify the Project biologist or designated biologist of any incidents that could affect special-status vegetation communities or special-status species. Incidents could include fuel leaks or injury to any wildlife. The Project biologist shall notify Metro of any incident, and Metro shall notify the appropriate regulatory agency.
- The Project biologist shall conduct a preconstruction survey for special-status species within the Project footprint prior to vegetation clearing, and/or ground disturbance. Any wildlife encountered will be encouraged to leave the Site Location footprint or relocated outside of the Site Location footprint if feasible.
- The Project biologist shall request that the contractor halt work, if necessary, and confer with Metro prior to contacting the appropriate regulatory agencies to ensure the proper implementation of species and habitat protection measures. The Project biologist shall report any noncompliance issue to Metro, and Metro will notify the appropriate regulatory agencies.
- The Project biologist shall inspect the Site Location footprint immediately prior to, and during, construction to identify the presence of invasive weeds and recommend measures to avoid their inadvertent spread in association with the Project. Such measures may include inspection and cleaning of construction equipment and use of eradication strategies.
- ESA fencing shall be placed along the perimeter of the Site Location footprint, where necessary, to prevent inadvertent intrusions into habitat identified as ESA. Work areas will be clearly marked in the field and confirmed by the Project biologist or designated biologist prior to any clearing, and the marked boundaries will be maintained throughout the duration of the work. Staging areas, including lay down areas and equipment storage areas, will be flagged and fenced with ESA fencing (e.g., orange plastic snow fence, orange silt fencing). Fences and flagging will be installed by the contractor in a manner that does not impact habitats to be avoided and such that it is clearly visible to personnel on foot and operating heavy equipment. If work occurs beyond the fenced or demarcated limits of impact, all work shall cease until the problem has been remedied to the satisfaction of Metro.

- No work activities, materials or equipment storage, or access shall be permitted outside the Site Location footprint without permission from Metro. All parking and equipment storage used by the contractor related to the Project shall be confined to the Site Location footprint and established paved areas. Undisturbed areas and special-status vegetation communities outside and adjacent to the Site Location footprint shall not be used for parking or equipment storage. Project-related vehicle traffic shall be restricted to the Site Location footprint and established roads and construction access points.
- The contractor shall be required to conduct vehicle refueling and maintenance in upland areas where fuel cannot enter waters of the U.S. or WOS waters of the State and areas that do not have suitable habitat to support federally and/or state-listed species. Equipment and containers shall be inspected daily for leaks. Should a leak occur, contaminated soils and surfaces shall be cleaned up and disposed of in accordance with applicable local, State, and federal requirements.

Mitigation Measure BIO-MM-2: Avoid Impacts on Migratory and Nesting Birds (All Site Locations and takedown locations of existing static displays). If construction activities occur between January 15 and September 15, a preconstruction nesting bird survey (within seven days prior to construction activities) shall be conducted by a qualified biologist to determine if active nests are present within the area proposed for disturbance in order to avoid the nesting activities of breeding birds by establishing a buffer until the fledglings have left the nest. The size of the buffer area varies with species and local circumstances (e.g., presence of busy roads) and is based on the professional judgement of the monitoring biologist, in coordination with the CDFW. The results of the surveys shall be submitted to Metro (and made available to the wildlife agencies [USFWS/CDFW], upon request) prior to initiation of any construction activities.

Mitigation Measure BIO-MM-3: Avoid impacts on Coastal California Gnatcatcher, and Least Bell's Vireo, if present (Applicable to Site Locations FF-24, FF-29 and FF-30). Suitable habitat for Coastal California Gnatcatcher and Least Bell's Vireo shall be removed outside of the nesting season (February 15 through September 30), between September 1 and February 14 for Coastal California Gnatcatcher and October 1 and March 14 for Least Bell's Vireo. Should habitat for Coastal California Gnatcatcher and Least Bell's Vireo require removal between February 15 and August 30 for Coastal California Gnatcatcher or between March 15 and September 30 for Least Bell's Vireo, or construction activities are initiated during this time, preconstruction surveys consisting of three separate surveys no more than seven days prior to vegetation removal shall be conducted by a

qualified biologist. Should Coastal California Gnatcatcher and Least Bell's Vireo be detected within 500 feet of the Site Location, construction activities shall be halted unless authorization has been obtained from USFWS.

Mitigation Measure BIO-MM-4: Avoid Potential Impacts on Special-Status Bats (All Site Locations and take down locations of static displays). A qualified bat biologist shall conduct a preconstruction survey for potential bat habitat within the take down area of the static display or Site Location footprint prior to vegetation clearing, and/or ground disturbance for take down locations and all Site Locations. If suitable habitat is not found, then no further action is required.

If suitable habitat is determined to be present:

- A qualified bat biologist shall survey potentially suitable structures and vegetation during bat maternity season (May 1st through October 1st), prior to construction, to assess the potential for the structures' and vegetation's use for bat roosting and bat maternity roosting, as maternity roosts are generally formed in spring. The qualified bat biologist shall also perform preconstruction surveys or temporary exclusion within 2 weeks prior to construction during the maternity season, as bat roosts can change seasonally. These surveys will include a combination of structure inspections, exit counts, and acoustic surveys.
- If a roost is detected, a bat management plan shall be prepared if it is determined that Project construction would result in direct impacts on roosting bats. The bat management plan shall be submitted to CDFW for review and approval prior to implementation and include appropriate avoidance and minimization efforts such as:
 - Temporary Exclusion. If recommended by the qualified bat biologist, to avoid indirect disturbance of bats while roosting in areas that would be adjacent to construction activities, any portion of a structure deemed by a qualified bat biologist to have potential bat roosting habitat and may be affected by the Project shall have temporary eviction and exclusion devices installed under the supervision of a qualified and permitted bat biologist prior to the initiation of construction activities. Eviction and subsequent exclusion shall be conducted during the fall (September or October) to avoid trapping flightless young bats inside during the summer months or hibernating/overwintering individuals during the winter. Such exclusion efforts are dependent on weather conditions, take a minimum of two weeks to implement, and must be continued to keep the structures free of bats until the completion of construction. All eviction and/or exclusion techniques shall be coordinated between the qualified bat biologist and the appropriate resource

agencies (e.g., CDFW) if the structure is occupied by bats. If deemed appropriate, the biologist may recommend installation of temporary bat panels during construction.

If a roost is detected but would only be subject to indirect impacts:

- **Daytime Work Hours.** All work conducted under the occupied roost shall take place during the day. If this is not feasible, lighting and noise will be directed away from night roosting and foraging areas.

b. Cultural Resources

Mitigation Measure CUL-MM-1: Prior to the start of ground disturbance activities during Project construction, including demolition, digging, trenching, drilling, or a similar activity (Ground Disturbance Activities), a qualified principal archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology shall be retained to prepare a written Cultural Resource Monitoring and Treatment Plan in accordance with the Secretary of the Interior's Standards for Archaeological Documentation, to reduce potential Project impacts on unanticipated archaeological resources unearthed during construction. The Cultural Resource Monitoring and Treatment Plan shall include the professional qualifications required of key staff, monitoring protocols relative to the varying archaeological sensitivity across the Site Locations, provisions for evaluating and treating unanticipated cultural materials discovered during ground-disturbing activities, situations under which monitoring may be reduced or discontinued, and reporting requirements.

Prior to the commencement of any Ground Disturbance Activities, the archaeological monitor(s) shall provide Worker Environmental Awareness Program (WEAP) training to construction workers involved in Ground Disturbance Activities that provides information on regulatory requirements for the protection of cultural resources. As part of the WEAP training, construction workers shall be informed about proper procedures to follow should a worker discover a cultural resource during Ground Disturbance Activities. In addition, construction workers shall be shown examples of the types of resources that would require notification of the archaeological monitor. The Applicant shall maintain on the Site Locations, for Metro inspection, documentation establishing that the training was completed for all construction workers involved in Ground Disturbance Activities.

The archaeological monitor(s) shall observe all Ground Disturbance Activities on the Site Locations that involve native soils. If Ground Disturbance Activities are occurring simultaneously at multiple Site Locations, the principal archaeologist shall determine if additional monitors are required for other Site Locations where such

simultaneous Ground Disturbance Activities are occurring. The on-site archaeological monitoring shall end when the archaeological monitor determines that monitoring is no longer necessary.

c. Geology and Soils

Mitigation Measure GEO-MM-1: The services of a Project paleontologist who meets the Society of Vertebrate Paleontology standards (including a graduate degree in paleontology or geology and/or a publication record in peer reviewed journals, with demonstrated competence in the paleontology of California or related topical or geographic areas, and at least two full years of experience as assistant to a Project paleontologist), shall be retained prior to ground disturbance activities associated with Project construction in order to develop a site-specific Paleontological Resource Mitigation and Treatment Plan. The Paleontological Resource Mitigation and Treatment Plan shall specify the levels and types of mitigation efforts based on the types and depths of ground disturbance activities and the geologic and paleontological sensitivity of the Site Locations. The Paleontological Resource Mitigation and Treatment Plan shall also include a description of the professional qualifications required of key staff, communication protocols during construction, fossil recovery protocols, sampling protocols for microfossils, laboratory procedures, reporting requirements, and curation provisions for any collected fossil specimens.

d. Hazards and Hazardous Materials

Mitigation Measure HAZ-MM-1 (All Site Locations): Soil Management Plan (SMP)—The Project Applicant shall implement an SMP, which shall be submitted to the Metro Capital Engineering Group and/or City of Los Angeles Department of Building and Safety for review and approval prior to the commencement of excavation and grading activities. The Site Locations shall be subject to the general protocols described in the SMP regarding prudent precautions and general observations and evaluations of soil conditions to be implemented throughout grading, excavation, or other soil disturbance activities on the Site Locations.

The protocols in the SMP shall include, but not be limited to, the following:

- Special precautions shall be taken to manage soils that will be disturbed during Project earthwork activities in areas containing Chemicals of Concern (COCs) above screening levels (SLs).
- The following requirements and precautionary actions shall be implemented when disturbing soil at the Site Locations: no soil

disturbance or excavation activities shall occur without a Project-specific Health and Safety Plan (HASP). Any soil that is disturbed, excavated, or trenched due to on-site construction activities shall be handled in accordance with applicable local, state, and federal regulations. Prior to the re-use of the excavated soil or the disposal of any soil from the Site Locations, the requirements and guidelines in the SMP shall be implemented. The General Contractor shall conduct, or have its designated subcontractor conduct, visual screening of soil during activities that include soil disturbance. If the General Contractor or subcontractor(s) encounter any soil that is stained or odorous (Suspect Soil), the General Contractor and subcontractor(s) shall immediately stop work and take measures to not further disturb the soils (e.g., cover suspect soil with plastic sheeting) and inform the Metro's representative and the environmental monitor. The environmental monitor, an experienced professional trained in the practice of the evaluation and screening of soil for potential impacts working under the direction of a licensed Geologist or Engineer, shall be identified by Metro prior to the beginning of work.

- Prior to excavation activities, the General Contractor or designated subcontractor shall establish specific areas for stockpiling Suspect Soil, should it be encountered, to control contact by workers and dispersal into the environment, per the provisions provided in the SMP.
- The General Contractor shall ensure that on-site construction personnel comply with all applicable federal, state, and local regulations, as well as the State of California Construction Safety Orders (Title 8). Additionally, if Suspect Soil is expected to be encountered, personnel working in that area shall comply with California Occupational Safety and Health Administration regulations specified in CCR Title 8, Section 5192. The General Contractor shall prepare a Project-specific HASP. It is the responsibility of the General Contractor to review available information regarding Site Location conditions, including the SMP, and potential health and safety concerns in the planned area of work. The HASP should specify COC action levels for construction workers and appropriate levels of personal protective equipment (PPE), as well as monitoring criteria for increasing the level of PPE. The General Contractor and each subcontractor shall require its employees who may directly contact Suspect Soil to perform all activities in accordance with the General Contractor and subcontractor's HASP. If Suspect Soil is encountered, to minimize the exposure of other workers to potential contaminants on the Site Location, the General Contractor or designated subcontractor may erect temporary fencing around excavation areas with appropriate

signage as necessary to restrict access and to warn unauthorized on-site personnel not to enter the fenced area.

- The General Contractor shall implement the following measures as provided in the SMP to protect human health and the environment during construction activities involving contact with soils at the Site Location: decontamination of construction and transportation equipment; dust control measures; storm water pollution controls and best management practices; and proper procedures for the handling, storage, sampling, transport and disposal of waste and debris.
- The excavated soil should be screened using a calibrated hand-held PID to test for VOCs and methane as necessary.
- In the event volatile organic compound (VOC)-contaminated soil is encountered during excavation on-site, a South Coast Air Quality Management District (SCAQMD) Rule 1166 permit shall be obtained before resuming excavation. Rule 1166 defines VOC-contaminated soil as a soil which registers a concentration of 50 ppm or greater of VOCs as measured before suppression materials have been applied and at a distance of no more than three inches from the surface of the excavated soil with an organic vapor analyzer calibrated with hexane. Notifications, monitoring, and reporting related to the SCAQMD Rule 1166 permit shall be the responsibility of the General Contractor. Protection of on-site construction workers shall be accomplished by the development and implementation of the HASP.
- Known below-grade structures at the Site Locations (i.e., storm water infrastructure) shall be removed from the ground or cleaned, backfilled, and left in place as appropriate during grading and excavation. If unknown below-grade structures are encountered during Site Location excavation, the General Contractor shall promptly notify the Metro's representative the same day the structure is discovered. Based on an evaluation of the unknown below-grade structure by the appropriate professional (e.g., environmental monitor, geotechnical engineer), Metro shall address the below-grade structure in accordance with applicable laws and regulations.
- A geophysical investigation shall be conducted at the Site Locations to clear the construction area of buried utilities

Mitigation Measure HAZ-MM-2 (Site Locations FF-1, FF-2, FF-3, FF-4, FF-05, FF-6, FF-13, FF-14, FF-29, FF-30, NFF-1, NFF-2, NFF-3, NFF-8, NFF-12, NFF-13, NFF-18, NFF-19, and NFF-21): Soil/vapor sampling and testing of soil samples shall be obtained during the site location-specific, design-level geologic and geotechnical investigation. Results of the testing would be submitted and approved by the Metro

Capital Engineering Group and/or the Los Angeles Department of Building and Safety (LADBS).

Mitigation Measure HAZ-MM-3 (Site Locations FF-4, NFF-3, NFF-18, and NFF-21): A geophysical investigation shall be conducted to clear the construction area of buried utilities and to identify buried substructures, specifically oil wells and USTS. Results of the geophysical investigation shall be submitted to and approved by the Metro Capital Engineering Group and/or LADBS.

e. Noise

Mitigation Measure NOI-MM-1: A temporary and impermeable sound barrier shall be erected at the locations listed below. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

During TCN Structure NFF-11 Construction

- Between the Project construction area and the residential uses on 67th Street north of the Site Location (receptor location R5). The temporary sound barrier shall be designed to provide a minimum 5-dBA noise reduction at the ground level of receptor location R5.

During TCN Structure NFF-12 Construction

- Between the Project construction area and the residential uses on Victoria Avenue west of the Site Location (receptor location R6). The temporary sound barrier shall be designed to provide a minimum 5-dBA noise reduction at the ground level of receptor location R6.

During TCN Structure NFF-14 Construction

- Between the Project construction area and the residential uses on Exposition Boulevard southeast of the Site Location (receptor location R7). The temporary sound barrier shall be designed to provide a minimum 5-dBA noise reduction at the ground level of receptor location R7.

During TCN Structure NFF-19 Construction

- Between the Project construction area and the residential uses on New Hampshire Avenue west of the Site Location (receptor location R10). The temporary sound barrier shall be designed to provide a minimum 5-dBA noise reduction at the ground level of receptor location R10.

During TCN Structure NFF-20 Construction

- Between the Project construction area and the residential uses on New Hampshire Avenue northwest of the Site Location (receptor

location R12). The temporary sound barrier shall be designed to provide a minimum 7-dBA noise reduction at the ground level of receptor location R12.

During TCN Structure NFF-21 Construction

- Between the Project construction area and the residential uses on Mateo Street west of the Site Location (receptor location R13). The temporary sound barrier shall be designed to provide a minimum 7-dBA noise reduction at the ground level of receptor location R13.

During TCN Structure FF-13 Construction

- Between the Project construction area and the residential uses on Casitas Avenue Street west of the Site Location (receptor location R20). The temporary sound barrier shall be designed to provide a minimum 5-dBA noise reduction at the ground level of receptor location R20.

During TCN Structure FF-26 Construction

- Between the Project construction area and the residential uses on Sepulveda Boulevard northeast of the Site Location (receptor location R25). The temporary sound barrier shall be designed to provide a minimum 6-dBA noise reduction at the ground level of receptor location R25.

During TCN Structure FF-28 Construction

- Between the Project construction area and the residential uses on Exposition Boulevard south of the Site Location (receptor location R27). The temporary sound barrier shall be designed to provide a minimum 6-dBA noise reduction at the ground level of receptor location R27.

During TCN Structure FF-33 Construction

- Between the Project construction area and the residential uses on Slauson Avenue north of the Site Location (receptor location R28). The temporary sound barrier shall be designed to provide a minimum 11-dBA noise reduction at the ground level of receptor location R28.

Mitigation Measure NOI-MM-2: Construction for TCN Structure NFF-20 shall be completed prior to occupation of the adjacent future residential building (receptor R12B). Alternatively, construction equipment for the installation of the TCN Structure NFF-20 shall be limited to a maximum 75 dBA (L_{eq}) at 50 feet from the equipment.

Mitigation Measure NOI-MM-3: A temporary noise barrier shall be provided during the removal of existing static signage where noise sensitive uses are located within 200 feet of and have direct line-of-sight to the existing

static signage to be removed. The temporary noise barrier shall be a minimum six feet tall and break the line-of-site between the construction equipment and the affected noise sensitive receptors.

Mitigation Measure NOI-MM-4: The use of large construction equipment (i.e., large bulldozer, caisson drill rig, and/or loaded trucks) shall be limited to a minimum of 80 feet away from the existing residences near proposed TCN Structure FF-33 (receptor 28) and the future residences near proposed TCN Structure NFF-20 (receptor 12B), if these residences are constructed and occupied at the time Project construction activities occurs.

f. Tribal Cultural Resources

Mitigation Measure MM-TCR-1 (Retain a Tribal Consultant and Qualified Archaeologist): Prior to any ground-disturbing activities on the Site Locations associated with the Project Area, a tribal consultant and qualified archaeologist shall be retained to monitor ground-disturbing activities and ensure proper implementation of the Tribal Cultural Resources Monitoring and Mitigation Program (described in Mitigation Measure TCR-2, below).

Ground disturbing activities are defined as excavating, digging, trenching, drilling, tunneling, grading, leveling, removing asphalt, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity at a Site Location. A tribal consultant is defined as one who is on the Native American Heritage Commission (NAHC) Tribal Contact list. The tribal consultant will provide the services of a representative, known as a tribal monitor.

A qualified archaeologist is defined as one who meets the Secretary of the Interior's (SOI) Professional Qualifications Standards (PQS) for archaeology. The qualified archaeologist shall submit a letter of retention to Metro no fewer than 30 days before ground-disturbing activities commence. The letter shall include a resume for the qualified archaeologist that demonstrates fulfillment of the SOI PQS.

Mitigation Measure MM-TCR-2 (Develop a Tribal Cultural Resource Mitigation and Monitoring Program): Prior to any ground-disturbing activities within the Project Area, a Tribal Cultural Resource Mitigation and Monitoring Program (TCR MMP) shall be prepared by the qualified archaeologist. The TCR MMP shall incorporate the results of SWCA's *Tribal Cultural Resources Assessment for the Los Angeles County Metropolitan Transportation Authority's Transportation Communication Network Project* report, and reasonable and feasible recommendations from tribal parties resulting from consultation. The TCR MMP shall include provisions for avoidance of unanticipated discoveries and

procedures for the preservation of unanticipated discoveries where possible.

The TCR MMP shall include, but not be limited to, provisions to conduct a worker training program, a monitoring protocol for ground-disturbing activities, discovery and processing protocol for inadvertent discoveries of tribal cultural resources, and identification of a curation facility should artifacts be collected. The TCR MMP shall require monitoring of ground-disturbing activities at all Site Locations and will provide a framework for assessing the geoarchaeological setting to determine whether sediments capable of preserving tribal cultural resources are present, and include a protocol for identifying the conditions under which additional or reduced levels of monitoring (e.g., spot-checking) may be appropriate at any given Site Location. The duration and timing of the monitoring shall be determined based on the rate of excavation, geoarchaeological assessment, and, if present, the quantity, type, spatial distribution of the materials identified, and input of the tribal consultant or their designated monitor. During monitoring, daily logs shall be kept and reported to Metro on a monthly basis.

During ground-disturbing activities, the monitors shall have the authority to temporarily halt or redirect construction activities in soils that are likely to contain potentially tribal cultural resources, as determined by the qualified archaeologist in consultation with the tribal monitor. In the event that tribal cultural resources or potential tribal cultural resources are exposed during construction, work in the immediate vicinity of the find shall stop within a minimum of 25 ft or as determined by the qualified archaeologist in consultation with the tribal consultant based on the nature of the find and the potential for additional portions of the resource to remain buried in the unexcavated areas of the project site. The qualified archaeologist in consultation with the tribal consultant will evaluate the significance of the find and implement the protocol described in the TCR MMP before work can resume in the area surrounding the find that is determined to have sensitivity. Construction activities may continue in other areas in coordination with the qualified archaeologist and tribal consultant. Soils that are removed from the work site are considered culturally sensitive and will be subject to inspection on-site by the tribal and archaeological monitors. Provisions for inspection at an off-site location would be determined through consultation with the tribal and archaeological monitors, construction personnel, and Metro. Any tribal cultural resources that are not associated with a burial are subject to collection by the qualified archaeologist.

The TCR MMP shall also summarize the requirements for coordination with consulting tribal parties in the event of a tribal cultural resource or potential tribal cultural resource is inadvertently discovered, as well as the applicable regulatory compliance measures or conditions of

approval for inadvertent discoveries, including the discovery of human remains, to be carried out in concert with actions described in the TCR MMP and treatment plan prepared in compliance with Mitigation Measure TCR-3. The TCR MMP shall be prepared in compliance with Public Resources Code Section 5024.1, Title 14 California Code of Regulations, Section 15064.5 of the CEQA Guidelines, and PRC Sections 21083.2 and 21084.1. The TCR MMP shall be submitted to Metro at least 30 days prior to initiating ground-disturbing activities.

Mitigation Measure MM-TCR-3 (Treatment of Known Tribal Cultural Resources): A treatment plan will be developed for any historical archaeological sites that may be adversely affected/significantly impacted by the Project, including but not limited to CA-LAN-1575/H. The treatment plan will be developed based on the known constituents to guide the post-discovery process and initial treatment requirements upon discovery. The treatment plan will outline data recovery procedures to be followed and shall require controlled archaeological excavation within the first eight feet (ft) at all Site Locations proposed to be located within known tribal cultural resources, specifically an excavation unit measuring 3.28 ft by 3.28 ft across extending to a depth of at least 4.92 ft below the unpaved surface, followed by the use of a 4 inch hollow stem hand-auger to a total depth of at least 9.84 ft below the unpaved surface. Subsequent mechanical drilling will be conducted in approximately 1.64-ft increments to a depth of approximately 20 ft below the surface. Sediments from each of the 1.64-ft mechanical excavation levels will be inspected for the presence of Native American objects or evidence of a tribal cultural resource, and relevant environmental information obtained from the sediments will be recorded. The treatment plan will include provisions to allow for standard mechanical excavation to resume at levels above these depths in the event that sufficient evidence is identified to demonstrate that the sediments are more than 20,000 years old.

The treatment plan may be modified and updated depending on the nature of the discovery and consultation with the State Historic Preservation Office (SHPO) and consulting parties. The treatment plan would be developed so that treatment of historical resources meets the Secretary of the Interior's *Standards and Guidelines* (1983) for archaeological documentation, the California Office of Historic Preservation (OHP)'s *Archaeological Resources Management Report, Recommended Contents and Formats* (1989), the Advisory Council on Historic Preservation's publication *Treatment of Archaeological Properties: A Handbook*, and the Department of the Interior's Guidelines for Federal Agency Responsibility under Section 110 of the National Historic Preservation Act, and the Society for California Archaeology's *Guidelines for Determining the Significance of and Impacts to Cultural Resources and Fieldwork and Reporting Guidelines for Archaeological, Historic, and Tribal Cultural Resources*.

12. Summary of Alternatives

This Draft EIR examined three alternatives to the Project in detail, which include Alternative 1, the No Project Alternative; Alternative 2, Elimination of Impacts Relating to Historical Resources Alternative; and Alternative 3, Elimination of All Significant and Unavoidable Impacts Alternative. Refer to Section V, Alternatives, of this Draft EIR for a more detailed description of these alternatives, a comparative analysis of the impacts of these alternatives with those of the Project, and a description of the alternatives considered but rejected as infeasible.

a. 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. 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.

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.

b. 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 (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.

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. 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.

c. Alternative 3: Elimination of All 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 (of 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.

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.

f. 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, Elimination of All Significant and Unavoidable Impacts Alternative. A detailed description of the potential impacts associated with each alternative is provided in Section V, Alternatives, of this Draft EIR. 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, the Elimination of All Significant and Unavoidable Impacts Alternative, would be the Environmentally Superior Alternative. 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. 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.