

ATTACHMENT A

**FINDINGS OF FACT  
AND  
STATEMENT OF OVERRIDING  
CONSIDERATIONS**

**Wilshire Bus Rapid Transit Project**

October 2010

## 1.0 Introduction

In September 2007, the Los Angeles County Metropolitan Transportation Authority (LACMTA) and the City of Los Angeles submitted a “Very Small Starts” funding application to the Federal Transit Administration (FTA) for the Wilshire Bus Rapid Transit (BRT) Project. In December 2007, FTA granted LACMTA pre-award authority to incur costs for project development activities prior to grant approval, including finalization of any necessary environmental analysis for the proposed project.

LACMTA, in coordination with the City of Los Angeles and Los Angeles County, began evaluating the proposed Wilshire BRT Project in November 2008, as part of preparing an Initial Study/Environmental Assessment (IS/EA). Between November 12, 2008 and November 19, 2008, four community meetings were held along the Wilshire corridor to present the Wilshire BRT Project and solicit any questions and/or comments for the technical team to incorporate. In response to the comments and input received at these community meetings, the environmental document was elevated to an Environmental Impact Report/Environmental Assessment (EIR/EA), which was circulated for public review from June 10, 2010 through July 26, 2010. A Final EIR/EA has been prepared to address agency and public comments received on the Draft EIR/EA.

The Findings of Fact have been prepared to comply with the requirements of the California Environmental Quality Act (CEQA)(Public Resources Code Section 21000) and the *State CEQA Guidelines* (California Code of Regulations Title 14 Section 15000) and reflect the information obtained and analyses conducted in the Final EIR/EA for the Wilshire Bus Rapid Transit (BRT) Project.

## 2.0 Project Description

### 2.1 Project History and Background

Wilshire Boulevard is the most heavily used transit corridor in Los Angeles County, with over 80,000 bus boardings taking place along the corridor each weekday. In addition to being the most heavily used transit corridor in the County, Wilshire Boulevard has the distinction of having some of the highest average daily traffic (ADT) volumes in the City of Los Angeles. Approximately 110,000 automobiles pass through the intersections of Westwood Boulevard, Gayley Avenue, and Veteran Avenue each weekday in the Westwood area. While ADT volumes are lower along the eastern portion of the project area (e.g., the ADT volume at Fairfax Avenue is 62,000), the corridor’s average ADT volume is estimated at 80,000. Moreover, Wilshire Boulevard is an important strategic BRT corridor due to the following: (1) the Mid-City/Westside segment of Wilshire Boulevard is a highly significant origin and/or destination point for trips in southern California, especially for transit trips, over 41% of which either originate or terminate in the Wilshire corridor; (2) the Wilshire corridor has a significantly higher transit mode split (20%) than the City of Los Angeles as a whole (8%), and the trend is expected to increase from nearly 2.5 to 2.8 times the City mode split; and (3) the Wilshire corridor currently has very high internal trip retention (over half of all trips begin and end in the corridor), and despite growth in regional trips, the corridor is expected to maintain these high internal trip retention percentages.

With increasing ADT volumes on Wilshire Boulevard, demands for viable alternatives to the automobile have increased as congestion continues to slow automobile travel. This same congestion also slows buses, increasing travel time, and reducing schedule reliability for transit customers, while increasing operating costs for Metro. Average bus speeds, along with automobile speeds, have declined steadily over the past 20 years. The Wilshire BRT Project is intended to further improve bus passenger travel times, service reliability, ridership of the existing Wilshire BRT system, and encourage a shift from automobile use to public transit.

In March 2004, the Los Angeles Department of Transportation (LADOT) and LACMTA implemented peak period bus lanes along a one-mile segment of Wilshire Boulevard between Centinela Avenue and Federal Avenue in West Los Angeles, as part of a Bus Lane Demonstration Project. The purpose of this demonstration project was to test whether curbside, exclusive bus lanes operating in the a.m. and p.m. peak periods would significantly improve bus travel speeds and service on Wilshire Boulevard. This demonstration project resulted in improvements in bus speeds and reliability through the one-mile segment. Before and after data analysis indicated that this demonstration project resulted in a 14 percent bus speed improvement and up to a 32 percent improvement in bus schedule reliability.

In November 2006, LACMTA and LADOT began studying the feasibility of implementing end-to-end bus lanes on Wilshire Boulevard between downtown Los Angeles and the City of Santa Monica. The City of Los Angeles and LACMTA began the Wilshire Bus Speed Improvement Study. Three options were developed by LADOT, which are as follows:

- Peak period end-to-end bus lanes, which consists of the conversion of Wilshire Boulevard curb lanes from mixed flow to bus and right-turn only, and implementation of a number of engineering enhancements, including increased bus signal priority, bus stop relocations, pavement repair, and minor on-street parking space removal to improve bus speeds, schedule reliability, and overall bus travel times.
- All day mini bus lanes, which consist of implementation of “mini” bus lanes in selected segments, construction of a number of minor street improvements, and implementation of the engineering enhancements identified above.
- Implementation of engineering enhancements (e.g., traffic signal modifications/Transit Priority System) only.

In May 2007, the Los Angeles City Council was presented with the above options and made a decision to pursue the first option of constructing peak period end-to-end bus lanes, which clearly met the corridor objectives to improve schedule reliability, improve passenger travel times and average bus speeds, minimize parking space removal, and encourage a mode shift from automobile to bus.

In August 2007, the demonstration project was temporarily suspended by the Los Angeles City Council until the one-mile segment could be integrated into a larger bus lane project.

## 2.2 Project Goals and Objectives

The Wilshire BRT Project is intended to further improve bus passenger travel times, service reliability, ridership of the existing Wilshire BRT system, and encourage a shift from

automobile use to public transit. When implemented, bus passenger travel times are expected to improve by an average of 24%. Up to a 10% mode shift from mixed flow to bus use is projected. Based on the bus travel time improvements and associated ridership increases experienced with the Metro Rapid Program to-date, transit ridership along the Wilshire corridor is anticipated to increase between 15% and 20%.

The goals and objectives for the project have been developed from the transportation and land use goals and objectives of local and regional agencies, including the City of Los Angeles, Los Angeles County, and the Southern California Association of Governments (SCAG), who serves as the regional Metropolitan Planning Organization (MPO), and are consistent with the other transit improvements currently planned in Los Angeles County. The following is a list of general project goals and objectives that have been developed for the proposed project:

- Improve bus passenger travel times by allowing buses to travel in dedicated peak-period bus lanes for the majority of the alignment between Valencia Street to the east and Centinela Avenue to the west;
- Improve bus service reliability by separating buses from the already high levels of corridor traffic congestion;
- Improve traffic flow along Wilshire Boulevard;
- Repave the curb lanes along damaged portions of Wilshire Boulevard to allow their effective use by buses during peak periods and by both buses and automobiles during non-peak periods;
- Encourage shift from automobile use to public transit by continuing to attract new transit riders;
- Improve air quality in Los Angeles County with the reduction in mobile source emissions resulting from a mode shift from automobile use to bus use; and
- Minimize impacts to existing on-street parking.

## 2.3 Project Characteristics

In consideration of comments received during the public review of the Draft EIR/EA, the LACMTA Board, the Los Angeles City Council, and the Los Angeles County Board of Supervisors have selected Alternative A – Truncated Project Without Jut-Out Removal as the preferred alternative. The project as proposed under Alternative A was analyzed at the same level of detail as the proposed project in the Draft EIR/EA.

Implementation of the project as proposed under Alternative A would require a number of general improvements. These general improvements include the restriping of traffic lanes, as necessary; conversion of existing curb lanes to bus lanes in each direction during peak periods; upgrade of the existing transit signal priority system; selective street widening; reconstruction/ resurfacing of curb lanes in select areas; and installation of traffic/transit signage and pavement markings, as necessary, to implement dedicated peak period bus lanes.

A variety of activities are proposed along the entire length of the project corridor within the City's boundaries (approximately 8.4 miles). Most of the existing curb lanes on Wilshire

Boulevard in the City of Los Angeles would be “converted” to a bus and right-turn only operation in the peak periods (7 a.m. to 9 a.m. and 4 p.m. to 7 p.m.) on weekdays. In these segments, the curb lanes would be repaired or reconstructed, where necessary, and restriped and signed as peak period bus lanes. In other areas, curbside bus lanes would be added as new lanes to Wilshire Boulevard by widening. Upgrades to the transit signal priority system would also be implemented, including (1) addition of bus signal priority at intersections with near-side bus stops (a recently developed and successfully tested concept), (2) increase in maximum available time for transit signal priority from 10 percent to 15 percent of the traffic signal cycle at minor intersections, and (3) reduction in the number of traffic signal recovery cycles from two to one at key intersections along the corridor.

A portion of the project is under County jurisdiction, between Veteran Avenue and Federal Avenue (approximately 0.8 mile) near the Veterans Administration facilities. Key elements of the County’s project scope include widening Wilshire Boulevard between Bonsall Avenue and Federal Avenue, reduction of adjacent sidewalks to a uniform width, traffic lane restriping, adjustments to geometrics and traffic signals, signage and markings, and a 470-foot extension of an eastbound left-turn pocket at Sepulveda Boulevard.

Geographically, the key elements of the project as proposed under Alternative A can be discussed based upon specific segments of the 9.2-mile Wilshire Boulevard corridor (not including the City of Beverly Hills). Proposed in both the eastbound and westbound directions, from east to west, these project segments can be summarized as follows:

- From S. Park View Street to Western Avenue (approximately 1.8 miles), existing curb lanes would be converted to peak period bus lanes.
- From Western Avenue to San Vicente Boulevard (approximately 3.6 miles), curb lanes would be reconstructed/resurfaced and converted to peak period bus lanes. The curb lanes in this segment have deteriorated to the point that both buses and vehicles seldom use the lanes because of extreme rough and uneven pavement conditions. Reconstruction of the roadway base (below the pavement surface) and curb and gutters, where damaged, would not only allow buses to consistently use the curb lanes but also improve the traffic capacity of the two adjacent lanes (in each direction) by moving buses from the curb-adjacent lanes to the curb lanes, thereby improving both the vehicular and transit levels of service in this segment.
- Within the Beverly Hills city limits (2.6 miles), no bus lanes would be implemented.
- From the Beverly Hills city limits, west of the intersection of Wilshire Boulevard and Santa Monica Boulevard, to Westholme Avenue (approximately 1.2 miles), existing jut-outs would be retained, and curb/traffic lanes would be reconstructed/resurfaced and converted to peak period bus lanes.
- From Westholme Avenue to mid-block Veteran Avenue/Gayley Avenue (approximately 0.8 mile), existing jut-outs would be retained, and curb/traffic lanes would be converted to peak period bus lanes.
- From mid-block Veteran Avenue/Gayley Avenue to Sepulveda Boulevard (approximately 0.3 mile), no bus lanes would be implemented.
- From Sepulveda Boulevard to Bonsall Avenue (approximately 0.2 mile), no bus lanes would be implemented. However, at Sepulveda Boulevard, the eastbound left-turn pocket would be lengthened by approximately 470 feet to accommodate a greater number

of vehicles that are currently queued in the No. 1 eastbound traffic lane, resulting in full use of the No. 1 lane for through traffic movements.

- From Bonsall Avenue to Federal Avenue (approximately 0.4 mile), in order to accommodate an eastbound peak period bus lane, the sidewalk widths on both sides of Wilshire Boulevard would be reduced to a uniform width. Both eastbound and westbound lanes would be restriped. Wilshire Boulevard between Interstate 405 and Federal Avenue is bordered by the Veterans Administration (VA) property. The sidewalk widths on both sides of Wilshire Boulevard in this segment vary between 10 and 15 feet.
- From Federal Avenue to Barrington Avenue (approximately 0.1 mile), both sides of Wilshire Boulevard would be widened by reducing the sidewalk widths on the north and south sides, allowing restriping of the street and creation of a new eastbound peak period bus lane and conversion of the existing westbound curb lane to a peak period bus lane. The intersection of Wilshire Boulevard and Federal Avenue is extremely congested in the eastbound direction. The widening of this two-block segment would allow buses to pass safely and quickly through the intersection of Wilshire Boulevard and Federal Avenue and provide a contiguous eastbound bus lane from Centinela Avenue to Bonsall Avenue.
- From Barrington Avenue to Centinela Avenue (approximately 0.8 mile), existing curb lanes would be converted to peak period bus lanes.

## 2.4 Alternatives to the Proposed Project

### No Project Alternative

This alternative is required by Section 15126.6(e) of the CEQA Guidelines and assumes that the proposed project would not occur. Under the No Project Alternative, proposed improvements to 9.9 miles of the Wilshire Corridor included under the proposed project would not be implemented. Specifically, the proposed restriping and widening of some existing portions of the Wilshire corridor would not occur. The No Project Alternative would not include the conversion of existing curb lanes to bus lanes in each direction during peak periods; upgrade of the existing transit signal priority system; selective street widening; reconstruction/resurfacing of curb lanes in select areas; and, installation of traffic/transit signage and pavement markings, as necessary, to implement dedicated peak period bus lanes. Existing conditions of the Wilshire Corridor would remain under this alternative. Consequently, the No Project Alternative would not achieve or fulfill any of the goals and objectives of the proposed project.

### Alternative A: Truncated Project Without Jut-Out Removal

As discussed above, Alternative A – Truncated Project Without Jut-Out Removal would include the development of an 8.7 mile bus lane from the Wilshire Boulevard/S. Park View Street intersection to the Wilshire Boulevard/Centinela Avenue intersection. This alternative would eliminate the bus lane from mid-block Veteran Avenue/Gayley Avenue to Sepulveda Boulevard, totaling 0.3 mile. Additionally, this alternative would eliminate the jut-out removal between Comstock Avenue and Malcolm Avenue (1.0 mile). The existing traffic lane would be converted to a bus lane in each direction between Comstock Avenue and Malcolm Avenue. Under Alternative A, an additional 1.8 miles of curb lane reconstruction/resurfacing would occur between Fairfax Avenue and San Vicente Boulevard and between the western border of the City of Beverly Hills and Westholme Avenue.

The key differences between this alternative and the proposed project are summarized from east to west (and implemented in both the eastbound and westbound directions), as follows:

- Elimination of the bus lane between Valencia Street and S. Park View Street;
- Inclusion of an additional 1.8 miles of curb lane reconstruction/resurfacing between Fairfax Avenue and San Vicente Boulevard and between the western border of the City of Beverly Hills and Westholme Avenue;
- Retention of the jut-outs between Comstock Avenue and Malcolm Avenue; and
- Elimination of the bus lane from approximately 300 feet east of Veteran Avenue to the I-405 northbound ramps.

## **Alternative B: Truncated Project**

The Truncated Project Alternative would include a shortened bus route (8.7 miles) compared to the 9.7 miles of exclusive bus lane included under the proposed project. Specifically, this alternative would eliminate a bus lane from Valencia Street to S. Park View Street, totaling 0.7 mile. Additionally, under this alternative, a bus lane from mid-block Veteran Avenue/Gayley Avenue to Sepulveda Boulevard, totaling 0.3 mile, would be eliminated.

Although this project would meet the project's objectives, this alternative is not being evaluated further because the cost of this alternative would exceed the per-mile amount allowed under the Federal Very Small Starts Program as it reduces the project length but retains the expense of the jut-out removal. Accordingly, this project alternative would not qualify for the federal funding that has been allocated to the project. Without this funding, LACMTA and LADOT would not have adequate funds to implement this alternative.

In addition, this alternative would neither avoid nor substantially lessen any of the significant effects identified for the proposed project. As such, this project alternative was considered infeasible and eliminated from further analysis in the EIR/EA.

## **Alternative C: Mini-Bus Lanes**

The Mini-Bus Lanes Alternative would include a 2.5-mile bus lane compared to the 9.7 miles that would be included under the proposed project. This alternative would include bus lanes in selected segments plus street improvements and engineering enhancements. This alternative is not being evaluated further because, while it would improve bus travel time through several congested locations, it would not substantially improve schedule reliability and reduce bus "bunching" due to congested conditions elsewhere in the corridor. One of the goals of the project is to increase transit ridership by providing more reliable bus service, and this alternative would not meet that goal. This alternative would also be very difficult to enforce because of the intermittent nature of the bus lanes, as well as their short length, and would require an intensive enforcement approach. Additionally, since this alternative would not create a continuous BRT corridor, it would not be eligible for federal funding as part of the Very Small Starts Program. Finally, this alternative would require physical widening of Wilshire Boulevard within the Wilshire Community Plan Area, which the Community Plan prohibits. As such, this project alternative was considered infeasible and eliminated from further analysis in the EIR/EA.

### 3.0 Record of Proceedings

For purposes of CEQA and these Findings, the Record of Proceedings for the project consists of the following documents, at a minimum:

- Notice of Preparation, Notice of Completion, and Notice of Availability and all other public notices issued by the LACMTA in conjunction with the project;
- Wilshire BRT Project Draft EIR/EA;
- Wilshire BRT Project Final EIR/EA;
- Mitigation Monitoring and Reporting Program for the project;
- All findings and resolutions adopted by the LACMTA Board in connection with the project and all documents cited or referred to therein;
- Any documents expressly cited in the foregoing documents, in addition to the Findings of Fact and Statement of Overriding Considerations; and
- Any other materials required to be in the record of proceedings by Public Resources Code Section 21167.6, Subdivision (e).

The custodian of the documents comprising the record of proceedings is Ms. Martha Butler, LACMTA, One Gateway Plaza, Los Angeles, CA 90012.

### 4.0 Findings Required Under CEQA

Public Resources Code (PRC) Section 21002 provides that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects, and that the procedures required [by CEQA] are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects.” Section 21002 also states that “in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.”

The mandate and principles stated above are implemented, in part, through the CEQA requirement that agencies must adopt findings before approving projects for which EIRs are required (PRC Section 21081(a) and CEQA Guidelines Sections 15091 and 15096(h)). For each significant environmental effect identified in an EIR for a proposed project, the approving agency must issue a written finding reaching one or more of three permissible conclusions as follows (CEQA Guidelines Section 15091(a)):

- (1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
- (2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

- (3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

For purposes of these findings, the term “avoid” refers to the effectiveness of one or more mitigation measures to reduce an otherwise significant effect to a less-than-significant level. In contrast, the term “substantially lessen” refers to the effectiveness of such measure or measures to substantially reduce the severity of a significant effect, but not to reduce that effect to a less-than-significant level. Although CEQA Guidelines Section 15091 requires only that approving agencies specify that a particular significant effect is avoided or substantially lessened, these findings, for purposes of clarity, in each case will specify whether the effect in question has been reduced to a less-than-significant level or has simply been substantially lessened but remains significant.

With respect to a project for which significant impacts are not avoided or substantially lessened either through the adoption of feasible mitigation measures or a feasible environmentally superior alternative, a public agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project’s economic, legal, social, technological, or other benefits rendered acceptable its unavoidable adverse environmental effects (CEQA Guidelines Sections 15043(b) and 15093).

These findings constitute LACMTA’s best efforts to set forth the rationales and support for its decision under the requirements of CEQA. In addition, since the LACMTA Board, the Los Angeles City Council, and the Los Angeles County Board of Supervisors have selected Alternative A – Truncated Project Without Jut-Out Removal as the preferred alternative, these findings are focused on Alternative A and not on the proposed project described in the Draft EIR/EA.

## 5.0 Legal Effect of Findings

To the extent that these findings conclude that various proposed mitigation measures outlined in the Final EIR/EA are feasible and have not been modified, superseded, or withdrawn, LACMTA, in conjunction with the City and County of Los Angeles, hereby binds itself to implement these measures. These findings constitute a binding set of obligations that will come into effect when the LACMTA Board decision makers formally approve the project (i.e., Alternative A).

The mitigation measures are also referenced in the Mitigation Monitoring and Reporting Program adopted concurrently with these findings and will be effectuated through the process of constructing and implementing the project.

## 6.0 Mitigation Monitoring and Reporting Program

A Mitigation Monitoring and Reporting Program (MMRP) has been prepared for the Wilshire BRT Project and has been adopted concurrently with these findings. LACMTA and the City and County of Los Angeles use the MMRP to track compliance with project

mitigation measures. The MMRP will remain available for public review during the compliance period.

## 7.0 Significant Effects and Mitigation Measures

The Final EIR/EA identified several significant environmental effects (or “impacts”) that the project will cause. Some of these significant effects are lessened or made not significant by implementation of feasible mitigation measures. Others cannot be avoided by the adoption of feasible mitigation measures or feasible environmentally superior alternatives (Alternative A – Truncated Project Without Jut-Out Removal); however, these effects are outweighed by overriding considerations set forth in Section 9 below. This section (Section 7.0) presents in greater detail the LACMTA’s findings with respect to the environmental effects of the project (i.e., Alternative A).

For each of the significant project or cumulative impacts associated with the project, the following information is provided:

- Description of Project Impacts – A specific description of each significant environmental impact identified in the Draft or Final EIR/EA.
- Proposed Mitigation – Mitigation measures or actions that are proposed for implementation as part of the project.
- Finding – The findings made are those allowed by Section 21081 of the California PRC. The findings are made in two parts. In the first part, a judgment is made regarding the significance of the impact or effect. In the second part, which pertains only to impacts found to be significant, one of three specific findings is made, in accordance with the statement of acceptable findings provided in Section 15091 of the CEQA Guidelines.
- Rationale – A summary of the reasons for the decision.
- Reference – A notation on the specific section in the Draft or Final EIR/EA that includes the evidence and discussion of the identified impact.

### 7.1 Traffic, Circulation, and Parking

- 1) **Impact T1: Exceed LOS Criteria under projected 2012 and 2020 Levels of Service.**
  - a. *Description of Project Impacts* – The project as proposed under Alternative A would result in significant impacts related to the exceedance of level-of-service (LOS) criteria for multiple intersections in both 2012 and 2020 project years.
  - b. *Proposed Mitigation* – At some of the intersections at which the project as proposed under Alternative A would have a significant impact on traffic operations, the following mitigation measures would improve traffic operations and reduce the impacts to less-than-significant levels:

**T-1:**

- Barrington Avenue/Wilshire Boulevard – The traffic signal at this intersection shall be modified to include a westbound “Protected plus Permitted” phase. By adding a “protected” left-turn phasing (a left-turn arrow), traffic operations can be improved and delay reduced, and the project impact at this location would be eliminated.
- Veteran Avenue/Wilshire Boulevard – The eastbound and westbound bus lane from mid-block Veteran Avenue/Gayley Avenue to Sepulveda Boulevard shall be truncated. By eliminating the bus lane along this segment of the project corridor and allowing other through vehicles into the curb lane, the project impact at this location would be eliminated.
- Westwood Boulevard/Santa Monica Boulevard – The southbound approach shall be restriped to add a second left-turn lane, and the southbound left-turn signal phasing shall be modified to “Protected” phasing. By adding a “protected” left-turn phasing, traffic operations can be improved and delay reduced, and the project impact at this location would be eliminated.
- Beverly Glen Boulevard/Olympic Boulevard – The traffic signal shall be modified to include a northbound “Protected plus Permitted” phase. By adding a “Protected plus Permitted” left-turn phasing (a left-turn arrow [and left turners can also turn on green]) for heavy turning movements, traffic operations can be improved and delay reduced, and the project impact at this location would be eliminated.
- Sepulveda Boulevard/Pico Boulevard – The traffic signal shall be modified to include eastbound and southbound “Protected plus Permitted” phases. By adding a “Protected plus Permitted” left-turn phasing for heavy turning movements, traffic operations can be improved and delay reduced, and the project impact at this location would be eliminated.
- Highland Avenue/3<sup>rd</sup> Street – The traffic signal shall be modified to include a westbound “Protected plus Permitted” phase. By adding a “Protected plus Permitted” left-turn phasing for heavy turning movements, traffic operations can be improved and delay reduced, and the project impact at this location would be eliminated.
- Alvarado Street/6<sup>th</sup> Street – The traffic signal shall be modified to include eastbound and westbound “Protected plus Permitted” phases. By adding a “Protected plus Permitted” left-turn phasing for heavy turning movements, traffic operations can be improved and delay reduced, and the project impact at this location would be eliminated.
- Highland Avenue/Wilshire Boulevard – The traffic signal shall be modified to include a westbound “Protected plus Permitted” phase. By adding a “Protected plus Permitted” left-turn phasing for heavy turning movements, traffic operations can be improved and delay reduced, and the project impact at this location would be eliminated.

- Fairfax Avenue/Olympic Boulevard – The traffic signal phasing shall be modified to improve efficiency, and an Adaptive Traffic Control System (ATCS) shall be installed at eight intersections on Olympic Boulevard between Fairfax Avenue and La Brea Avenue. The ATCS is a personal computer-based program that provides a fully responsive method to accommodate real-time (actual) traffic conditions. The expected benefit to traffic flow is a reduction in the volume-to-capacity (V/C) ratio of 0.03 at the eight upgraded intersections, which corresponds to a 7.5 second reduction in overall intersection delay.
  - La Brea Avenue/Olympic Boulevard – The traffic signal shall be modified to include an eastbound “Protected plus Permitted” phase. By adding a “Protected plus Permitted” left-turn phasing for heavy turning movements, traffic operations can be improved and delay reduced, and the project impact at this location would be eliminated.
  - Highland Avenue/Olympic Boulevard – The traffic signal shall be modified to include a westbound “Protected plus Permitted” phase. By adding a “Protected plus Permitted” left-turn phasing for heavy turning movements, traffic operations can be improved and delay reduced, and the project impact at this location would be eliminated.
  - Crenshaw Boulevard/Olympic Boulevard – ATCS shall be installed at six intersections along Olympic Boulevard between La Brea Avenue and Crenshaw Boulevard. The expected benefit to traffic flow is a reduction in the volume-to-capacity (V/C) ratio of 0.03 at the six upgraded intersections, which corresponds to a 7.5 second reduction in overall intersection delay.
- c. *Finding* – The impact(s) prior to mitigation is/are found to be:

**Significant**                       Not Significant

For those impacts that are found to be significant, the following additional finding is made:

Changes or alterations have been incorporated into the project that avoid or lessen the effect.

The lead agency lacks the jurisdiction to make the changes, but another agency does have such authority.

**Specific economic, social, or other considerations make infeasible mitigation measures or project alternatives.**

The impacts(s) subsequent to mitigation is/are found to be:

**Significant**                       Not Significant

- d. *Rationale* – For Years 2012 and 2020, a total of nine intersections are forecast to remain significantly affected after mitigation because no feasible mitigation measures could be identified for the following locations:

No feasible mitigation measures are available at the remaining nine intersections:

- Veteran Avenue/Sunset Boulevard;
- Bundy Drive/Wilshire Boulevard;
- Veteran Avenue/Santa Monica Boulevard;
- Westwood Boulevard/Olympic Boulevard;
- Westwood Boulevard/Pico Boulevard;
- Beverly Glen Boulevard/Santa Monica Boulevard;
- Fairfax Avenue/Wilshire Boulevard;
- La Brea Avenue/Wilshire Boulevard; and
- Overland Avenue/Santa Monica Boulevard.

The unmitigated impacts at the intersections identified above remain significant and unavoidable.

- e. *Reference* – Draft EIR/EA Section 4.1 and Section 5.2.2

**2) Impact T2: Exceed Significance Criteria for Local Residential Streets.**

- a. *Description of Project Impacts* – Impacts to local residential streets along the Wilshire corridor caused by potential traffic diversion during bus lane operations could occur.
- b. *Proposed Mitigation* – None required.
- c. *Finding* – The impact(s) prior to mitigation is/are found to be:

Significant                       **Not Significant**

- d. *Rationale* – Along the project corridor, Goshen Avenue between Bundy Drive and San Vicente Boulevard, and Lindbrook Drive and Ashton Avenue between Malcolm Avenue and Comstock Avenue, in the western part of the study area, are local residential streets adjacent and run parallel to Wilshire Boulevard. Texas Avenue, in the western part of the study area, also runs parallel to Wilshire Boulevard but is designated as a collector street and, therefore, not subject to a local residential street analysis. Additionally, 6<sup>th</sup> Street, 7<sup>th</sup> Street, and 8<sup>th</sup> Street, adjacent and parallel to Wilshire Boulevard in the eastern part of the study area, are designated as either collector or secondary streets between Fairfax Avenue and Lucas Avenue and, therefore, are not subject to a local residential street analysis.

Under Alternative A, study intersections on Wilshire Boulevard in the vicinity of Lindbrook Drive and Ashton Avenue operate at LOS D or better in 2012 and 2020. Therefore, it is not expected that a significant amount of traffic would divert from Wilshire Boulevard to these local residential streets. In the vicinity of Goshen Avenue, the Bundy Drive/Wilshire Boulevard and Federal Avenue-San Vicente Boulevard/Wilshire Boulevard intersections are projected to operate at

LOS E or F in 2012 and 2020. However, traffic diversion onto Goshen Avenue is unlikely since Goshen Avenue runs for only a short distance, eastbound left-turn movements from Wilshire Boulevard to Bundy Drive are relatively high-delay movements during peak hours, and northbound left-turn movements from San Vicente Boulevard to Goshen Avenue are prohibited. Therefore, no significant impacts to local residential streets are expected.

- e. *Reference* – Draft EIR/EA Section 4.1 and Section 5.2.2
- 3) **Impact T3: Exceed parking requirements or result in inadequate parking supply.**
- a. *Description of Project Impacts* – Under Alternative A, approximately 11 parking spaces between S. Park View Street and Fairfax Avenue (a distance of approximately 4.8 miles) would be removed to accommodate larger or relocated bus stops in order to facilitate bus movements in and out of stops. However, under Alternative A, parking supply would be unchanged between Comstock Avenue and Malcolm Avenue since jut-outs in this area would be retained. Therefore, no change in parking would occur in this area, and no impact would occur.
  - b. *Proposed Mitigation* – None required.
  - c. *Finding* – The impact(s) prior to mitigation is/are found to be:  
 Significant                       **Not Significant**
  - d. *Rationale* – The removed parking spaces between S. Park View Street and Fairfax Avenue would be spread throughout this segment of the project, with no more than three spaces being removed on any single block. The removed parking spaces would have a small effect on parking supply during off-peak hours. During peak periods, parking is prohibited under current conditions, so the removal of these parking spaces would not affect parking supply at all. Therefore, the removal or restriction of parking spaces on Wilshire Boulevard would result in less-than-significant impacts.
  - e. *Reference* – Draft EIR/EA Section 4.1 and Section 5.2.2

- 4) **Impact T4: Result in Auto/Bus transition conflicts at certain locations.**
- a. *Description of Project Impacts* – Along the Wilshire Boulevard BRT route, Metro buses would transition into and out of mixed-flow travel lanes at certain locations, depending on downstream roadway capacity changes and jurisdictional boundaries.
  - b. *Proposed Mitigation* – None Required.
  - c. *Finding* – The impact(s) prior to mitigation is/are found to be:  
 Significant                       **Not Significant**
  - d. *Rationale* – In order to reduce or avoid automobile and bus transition conflicts, the project as proposed under Alternative A would include installation of

appropriate signage along Wilshire Boulevard adjacent to each of the areas of potential conflict, in order to inform motorists of bus lane operation during peak hours. For potential traffic conflicts in both eastbound and westbound directions along Wilshire Boulevard, the installation of appropriate signage would ensure that the project as proposed under Alternative A would result in less-than-significant impacts related to automobile/bus transition conflicts. No mitigation measures are required.

- e. *Reference* – Draft EIR/EA Section 4.1 and Section 5.2.2

**5) Impact T5: Result in inadequate emergency access.**

- a. *Description of Project Impacts* – Construction and operation of the project as proposed under Alternative A could interfere with emergency vehicle access due to construction activities and bus lane restrictions.

- b. *Proposed Mitigation* – None required.

- c. *Finding* – The impact(s) prior to mitigation is/are found to be:

Significant                       **Not Significant**

- d. *Rationale* – Emergency vehicles would be permitted to use the bus lanes when they are in operation. Because these lanes would be free of most other vehicular traffic, emergency response time would likely improve during peak periods. During construction activities, alternative access routes would be utilized, and local emergency access would be retained at all times. Therefore, a less-than-significant impact would occur.

- e. *Reference* – Draft EIR/EA Section 4.1 and Section 5.2.2

## 7.2 Air Quality

**1) Impact AQ1: Conflict with or obstruct implementation of the applicable air quality management plan.**

- a. *Description of Project Impacts* – The project as proposed under Alternative A would be consistent with the projections in the South Coast Air Quality Management District’s (SCAQMD) Air Quality Management Plan (AQMP).

- b. *Proposed Mitigation* – None required.

- c. *Finding* – The impact(s) prior to mitigation is/are found to be:

Significant                       **Not Significant**

- d. *Rationale* – The project as proposed under Alternative A would be consistent with all local general plans and compatible with the surrounding uses. Because the project as proposed under Alternative A would be consistent with the local general plan, pursuant to SCAQMD guidelines, the project would be considered consistent with the region’s AQMP. As such, project-related emissions are accounted for in the AQMP, which is crafted to bring the Basin into attainment

for all criteria pollutants. Accordingly, the project as proposed under Alternative A would be consistent with the projections in the AQMP, thereby resulting in a less-than-significant impact.

e. *Reference* – Draft EIR/EA Section 4.2 and Section 5.2.2

**2) Impact AQ2: Violate any air quality standard or contribute substantially to an existing or projected air quality violation.**

a. *Description of Project Impacts* – Criteria pollutant emissions for both construction and operation of the project as proposed under Alternative A would result in a less-than-significant regional air quality impact.

b. *Proposed Mitigation* – None required.

c. *Finding* – The impact(s) prior to mitigation is/are found to be:

Significant

**Not Significant**

d. *Rationale* – Construction of the project as proposed under Alternative A has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the project site. In addition, fugitive dust emissions would result from demolition and construction activities. Mobile-source emissions, primarily NO<sub>x</sub>, would result from the use of construction equipment. However, criteria pollutant emissions would be less than the applicable SCAQMD significance thresholds, and as such, would result in a less-than-significant regional air quality impact.

Regional air pollutant emissions associated with project operations would be generated by operation of on-road vehicles. Mobile-source emissions are proportional to the vehicle miles traveled (VMT), which are proportional to new vehicle trips. The project as proposed under Alternative A would not generate new trips; however, the project would facilitate the movement of existing traffic through the study corridor, as well as other traffic generated by new development in the area. Consequently, the project may result in local traffic redistribution. However, the project itself would result in a violation of any air quality standard or contribute substantially to an existing or project air quality violation.

e. *Reference* – Draft EIR/EA Section 4.2 and Section 5.2.2

**3) Impact AQ3: Expose sensitive receptors to substantial pollutant concentrations.**

a. *Description of Project Impacts* – The project as proposed under Alternative A would result in less-than-significant impacts in exposing sensitive receptors to substantial pollutant concentrations.

b. *Proposed Mitigation* – None required.

c. *Finding* – The impact(s) prior to mitigation is/are found to be:

Significant

**Not Significant**

- d. *Rationale* – A conservative estimate of the project’s construction-period on-site mass emissions showed that the worst-case maximum emissions for all criteria pollutants would remain below their respective SCAQMD Localized Significance Threshold (LST). As such, localized impacts that may result from construction-period air pollutant emissions would be less than significant. The greatest potential for toxic air contaminant (TAC) emissions would be related to diesel particulate emissions associated with heavy equipment operations during site grading activities. The SCAQMD does not consider diesel-related cancer risks from construction equipment to be an issue due to the short-term nature of construction activities.

Since the project as proposed under Alternative A would continue to operate compressed natural gas (CNG) buses rather than diesel buses and would not result in the emission of acute and/or chronically hazardous TAC pollutants, potential project-generated air toxic impacts on surrounding land uses would be less than significant. No mitigation measures are necessary.

- e. *Reference* – Draft EIR/EA Section 4.2 and Section 5.2.2

**4) Impact AQ4: Create objectionable odors affecting a substantial number of people.**

- a. *Description of Project Impacts* – No construction activities or materials are proposed which would create a significant level of objectionable odors. As such, potential impacts during construction would be less than significant.
- b. *Proposed Mitigation* – None required.
- c. *Finding* – The impact(s) prior to mitigation is/are found to be:

Significant                       **Not Significant**

- d. *Rationale* – According to the SCAQMD CEQA Air Quality Handbook (South Coast Air Quality Management District 1993), land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The project as proposed under Alternative A would not include any uses identified by the SCAQMD as being associated with odors and, therefore, would not produce objectionable odors. As such, potential impacts would be less than significant with respect to objectionable odors.

Potential sources that may emit odors during construction activities include asphalt paving. SCAQMD Rule 1108 limits the amount of volatile organic compounds from cutback asphalt. Via mandatory compliance with SCAQMD Rules, no construction activities or materials are proposed which would create a significant level of objectionable odors. As such, potential impacts during construction would be less than significant.

- e. *Reference* – Draft EIR/EA Section 4.2 and Section 5.2.2

5) **Impact AQ5: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.**

a. *Description of Project Impacts* – The relative amounts of GHG emissions associated with the project are negligible. The amount of emissions from the project as proposed under Alternative A, without considering other cumulative global emissions, would not be enough to cause substantial climate change directly. Thus, project emissions, in isolation, are considered less than significant. However, climate change is a global cumulative impact, and the proper context for analysis of this issue is not a project’s emissions in isolation but, rather, its contribution to cumulative GHG emissions. Nevertheless, during operation of the project, it would be expected that a beneficial impact on GHG emissions would occur due to decreased traffic congestion along the Wilshire corridor, increased efficiency and use of the CNG-fueled Wilshire BRT, and decreased personal vehicle VMTs.

b. *Proposed Mitigation* – None required. Nevertheless, mitigation measures to reduce project-related GHG emissions by the greatest extent feasible are prescribed.

**AQ-1** To the extent applicable and practicable, minimize, reuse, and recycle construction-related waste.

**AQ-2** To the extent applicable and practicable, minimize grading, earth-moving, and other energy-intensive construction practices.

**AQ-3** To the extent applicable and practicable, replacement trees or landscaping shall be provided.

**AQ-4** To the extent applicable and practicable, use solar power or electricity from power poles rather than temporary diesel power generators.

c. *Finding* – The impact(s) prior to mitigation is/are found to be:

Significant                       **Not Significant**

d. *Rationale* – The project as proposed under Alternative A would reduce GHG emissions, compared with existing conditions, by improving traffic circulation and relieving local congestion. Implementation of prescribed mitigation measures during construction would further reduce the project’s GHG emissions. As such, the project as proposed under Alternative A would not conflict with the state’s goal of reducing GHG emissions to 1990 levels by 2020. Project impacts relative to GHG emissions and climate change would be less than significant.

e. *Reference* – Draft EIR/EA Section 4.2 and Section 5.2.2

## 7.3 Cultural Resources

### 1) Impact CR1: Potential Impacts on Archaeological Resources.

- a. *Description of Project Impacts* – The curb lanes on Wilshire Boulevard in the area near the La Brea Tar Pits are in extremely poor condition and are not used by buses and other vehicles to a high degree. Reconstruction of the roadway base (i.e., below the surface of the pavement) as well as curbs and gutters, where damaged, are proposed for this segment of the alignment. Despite heavy urbanization, buried cultural resources have been identified in the vicinity of the proposed construction zone. There is the potential for buried archaeological deposits to exist beneath previously disturbed and developed land surfaces in the project area.
- b. *Proposed Mitigation* – None required.
- c. *Finding* – The impact(s) prior to mitigation is/are found to be:  
  
 Significant                       **Not Significant**
- d. *Rationale* – The bulk of the project involves activities, such as sidewalk removal, pavement replacement, or restriping, which are not ground disturbing. For purposes of this project, pavement replacement is not considered a ground-disturbing activity. Therefore, the proposed improvements would have no direct or indirect impact on archaeological resources.
- e. *Reference* – Draft EIR/EA Section 4.3 and Section 5.2.2

### 2) Impact CR2: Impacts on Historic Resources.

- a. *Description of Project Impacts* – The project as proposed under Alternative A would reduce the sidewalk widths on the north and south sides of Wilshire Boulevard between Federal Avenue and Barrington Avenue, as well as on both sides of Wilshire Boulevard between Bonsall Avenue and Federal Avenue. Of the eight buildings that were identified as historical resources under the CEQA Guidelines, none were found to be affected by the project as proposed under Alternative A.
- b. *Proposed Mitigation* – None required.
- c. *Finding* – The impact(s) prior to mitigation is/are found to be:  
  
 Significant                       **Not Significant**
- d. *Rationale* – The project would convert existing curb lanes on Wilshire Boulevard to bus and right-turn only operation in the peak periods on weekdays. To implement the project as proposed under Alternative A, curb lanes would be repaired or reconstructed, where necessary, and restriped and signed as peak period bus lanes. In other areas, curbside bus lanes would be added as new lanes to Wilshire Boulevard by widening and restriping. As a result of consultation with the California State Historic Preservation Officer (SHPO) on April 3, 2008,

for the purposes of the built environment survey, only those areas where changes would occur to curbs and sidewalks would be included in the Area of Potential Effects (APE). This area is bounded by Bonsall Avenue to the east to Barrington Avenue to the west, extending one parcel on each side of Wilshire Boulevard excluding the north side of Wilshire between Bonsall Avenue and Federal Avenue (see map in Appendix C). The remainder of the project alignment involves lane repaving and/or restriping, would not involve any physical changes to any architectural resources or sidewalk, has no potential to affect historic properties, and is excluded from the APE. Of the eight buildings that were identified as historical resources under the CEQA Guidelines, none were found to be affected by the proposed project or Alternative A. Although an identified resource located at 1250 Federal Avenue (United States Army Reserve Center/Sadao Munemori Hall) is located immediately adjacent to where the widening would occur, the improvements proposed under Alternative A would not have a direct or indirect impact on the historic resource. As a result, based on field observations and a review of the proposed improvements under Alternative A, modifications to the sidewalks adjacent to the eight historic resources would have no direct or indirect impact on the characteristics that qualify those resources for inclusion in the National Register or the California Register.

- e. *Reference* – Draft EIR/EA Section 4.3 and Section 5.2.2

**3) Impact CR3: Impacts on Paleontological Resources.**

- a. *Description of Project Impacts* – Construction of the proposed project would include surface changes to pavement, sidewalks, and curbs. However, there is little potential to affect previously undisturbed paleontological resources. In those instances where sidewalk widths would be reduced, roadway base or curb lanes reconstructed, or turn pockets altered, the projected depths of subsurface work are anticipated to be very shallow with no excavation or disturbance of sub-grade below two feet. Given that the shallowest depth where significant fossil vertebrate remains may be encountered is six feet, it is anticipated that the proposed project would result in no direct or indirect impacts on paleontological resources.
- b. *Proposed Mitigation* – None required.
- c. *Finding* – The impact(s) prior to mitigation is/are found to be:

Significant                       **Not Significant**

- d. *Rationale* – A thorough examination of paleontological locality and specimen data of the Los Angeles County Natural History Museum’s Vertebrate Paleontology Section reveal that several fossil vertebrate localities lie directly along the project route area, and there are other localities nearby that occur in the same sedimentary deposits as are exposed or occur at depth in the proposed project route area. Excavations in the older Quaternary deposits throughout the entire project route area, at depths as shallow as six feet, have a good chance of uncovering significant fossil vertebrate remains. Due to previous complications of encountering tar seepage during construction related activities in portions of the project corridor, the ground disturbance proposed under Alternative A is not

anticipated to go beyond two feet below the surface. Therefore, no impacts would be anticipated to occur, and no mitigation measures are required.

- e. *Reference* – Draft EIR/EA Section 4.3 and Section 5.2.2

## 7.4 Noise

### 1) **Impact N1: Exposure to noise levels in excess of applicable standards and to substantial permanent increase in ambient noise in the project vicinity.**

- a. *Description of Project Impacts* – The project as proposed under Alternative A would increase noise temporarily along the corridor during construction. Noise during construction would primarily be generated from construction equipment. Although a less-than-significant impact would occur, noise control measures are recommended during construction to reduce the noise levels to the extent practicable in order to minimize the impact on nearby sensitive receptors. According to the traffic noise modeling results during project operation, the project would not cause an exceedance of City of Los Angeles or County of Los Angeles noise standards or materially worsen an existing standard violation. “With Project” noise levels in both the opening year and horizon year are predicted to decrease from what they would be “Without Project” at most locations, and increase only slightly in others. Therefore, traffic noise associated with the project as proposed under Alternative A would be considered a less-than-significant impact.
- b. *Proposed Mitigation* – Although construction noise impacts would be less than significant, construction noise could adversely affect nearby residents. However, the noise would be temporary and limited to the duration of the construction. Nonetheless, the following recommended measures may be incorporated into the project contract specifications to minimize construction noise impacts:

- N-1** To the extent applicable, practicable, and feasible, all noise-producing construction equipment and vehicles using internal combustion engines shall be equipped with mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features in good operating condition that meet or exceed original factory specification. Mobile or fixed “package” equipment (e.g., arc-welders, air compressors) may be equipped with shrouds and noise control features that are readily available for that type of equipment.
- N-2** To the extent applicable, practicable, and feasible, electrically powered equipment shall be used instead of pneumatic or internal combustion powered equipment.
- N-3** The use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only.
- N-4** No project-related public address or music system shall be audible at any adjacent receptor.

The noise control measures listed above would help in reducing the annoyance of high noise levels at adjacent noise-sensitive land uses to the extent practicable during construction.

- c. *Finding* – The impact(s) prior to mitigation is/are found to be:

Significant                       **Not Significant**

- d. *Rationale* – Assuming an average noise level of 89 dBA (at 50 feet distance from roadway centerline) during excavation activities for roadway reconstruction of the curb lanes, noise levels would temporarily increase by more than 15 decibels from the typical ambient daytime noise levels measured in the project area. Although the increases in noise levels would be substantial, the increases would be intermittent and temporary during daytime hours as permitted by the City's Noise Ordinance (i.e., 7:00 a.m. to 9:00 p.m. during weekdays, and 8:00 a.m. to 6:00 p.m. on Saturdays). Therefore, it is unlikely that significant impacts on noise-sensitive uses or activities would occur.

Under both Opening Year With Project conditions and under Horizon Year With Project conditions, predicted traffic noise levels during project operation would range from approximately 67 dBA CNEL to 71 dBA CNEL at selected locations along the Wilshire corridor at a distance of 75 feet.

- e. *Reference* – Draft EIR/EA Section 4.4 and Section 5.2.2

2) **Impact N2: Exposure to excessive groundborne vibration or groundborne noise levels.**

- a. *Description of Project Impacts* – The project as proposed under Alternative A would result in groundborne vibration or groundborne noise impacts as a result of construction activities and projected operational conditions. Vibratory compactors or rollers, pile drivers and pavement breakers can generate perceptible vibration. Heavy trucks can also generate groundborne vibration, which vary depending on vehicle type, weight, and pavement conditions. With regards to operational impacts under Alternative A, groundborne vibration in the project vicinity would continue to be generated by vehicles traveling along the local roadways, as they do in the existing condition.

- b. *Proposed Mitigation* – None required.

- c. *Finding* – The impact(s) prior to mitigation is/are found to be:

Significant                       **Not Significant**

- d. *Rationale* – Vibration levels due to construction activity at nearby sensitive receptors would be temporary and would be well below the significance criteria of 0.2 inches per second Peak Particle Velocity; thus, construction vibration and groundborne noise impacts would be less than significant. Under Alternative A, groundborne vibration in the project vicinity would continue to be generated by vehicles traveling along the local roadways, as they do in the existing condition. Since the project as proposed under Alternative A would only bring the closest travel lane 5-10 feet closer to the receptors, the change in vibration levels would

not be readily perceivable. Therefore, the project as proposed under Alternative A would result in less-than-significant operational vibration impacts.

- e. *Reference* – Draft EIR/EA Section 4.4 and Section 5.2.2

## 7.5 Land Use

### 1) Impact LU1: Compatibility with Surrounding Land Uses

- a. *Description of Project Impacts* – The project as proposed under Alternative A would include general improvements to portions of Wilshire Boulevard. Proposed improvements would include restriping of traffic lanes, as necessary; conversion of existing curb lanes to bus lanes in each direction during peak periods; upgrade of the existing transit signal priority system; selective street widening; reconstruction/resurfacing of curb lanes in select areas; and installation of traffic/transit signage and pavement markings, as necessary, to implement dedicated peak period bus lanes. The project as proposed under Alternative A would not result in any impacts related to compatibility with surrounding land uses.
- b. *Proposed Mitigation* – None required.
- c. *Finding* – The impact(s) prior to mitigation is/are found to be:  
  
 Significant                       **Not Significant**
- d. *Rationale* – No properties would be acquired, and no land use changes would occur under Alternative A. The project components described above would occur within the Wilshire Boulevard right-of-way. The existing transportation use of the corridor would remain under Alternative A. Therefore, the project as proposed under Alternative A is not anticipated to result in impacts related to incompatibility with surrounding land uses.
- e. *Reference* – Draft EIR/EA Section 4.5 and Section 5.2.2

### 2) Impact LU2: Division of Existing Neighborhood

- a. *Description of Project Impacts* – The project as proposed under Alternative A would consist of dedicated weekday peak period bus lanes in both the eastbound and westbound directions to be achieved primarily through the conversion of existing curb lanes to peak period bus lanes. The project as proposed under Alternative A would include the restriping and widening of some existing portions of the Wilshire corridor. Throughout the corridor, Wilshire Boulevard is designated and zoned for transportation uses. As the project would be limited to within the public rights-of-way, the project as proposed under Alternative A would not result in an impact related to division of an existing neighborhood.
- b. *Proposed Mitigation* – None required.
- c. *Finding* – The impact(s) prior to mitigation is/are found to be:  
  
 Significant                       **Not Significant**

- d. *Rationale*– All proposed improvements would occur along Wilshire Boulevard and would not divide neighborhoods located along the corridor. No impact is anticipated to occur under project implementation.
- e. *Reference* – Draft EIR/EA Section 4.5 and Section 5.2.2

**3) Impact LU3: Consistency with Applicable Plans and Policies**

- a. *Description of Project Impacts* – The project consists of dedicated weekday peak period bus lanes in both the eastbound and westbound directions to be achieved primarily through the conversion of existing curb lanes to peak period bus lanes. The project would also include the restriping and widening of some existing portions of the Wilshire corridor. However, it would not result in new land uses that would affect land use plans, policies, and regulations. The proposed project or Alternative A is anticipated to be consistent with all the local, regional, state, and federal jurisdictions and their plans for the project area.
- b. *Proposed Mitigation* – None required.
- c. *Finding*– The impact(s) prior to mitigation is/are found to be:  
  
 Significant                       **Not Significant**
- d. *Rationale* – The project as proposed under Alternative A is anticipated to be consistent with all the local, regional, state, and federal jurisdictions and their plans for the project area, including the Westlake Community Plan, Wilshire Community Plan, Westwood Community Plan, West Los Angeles Community Plan Area, and Brentwood-Pacific Palisades Community Plan. Furthermore, the project would not conflict with any Southern California Association of Governments (SCAG) Regional Transportation Plan goals or policies. Therefore, no impacts related to consistency are anticipated.
- e. *Reference* – Draft EIR/EA Section 4.5 and Section 5.2.2

## 7.6 Aesthetics

**1) Impact A1: Substantially degrade the existing visual character or quality of the site and its surroundings.**

- a. *Description of Project Impacts* – The project as proposed under Alternative A would convert existing curb lanes on Wilshire Boulevard to bus and right-turn only operation in the peak periods on weekdays. The project as proposed under Alternative A would involve the extension of the eastbound left-turn pocket at Sepulveda Boulevard and street widening between Bonsall and Federal Avenues, which would affect the existing median, resulting in the removal of a number of small jacaranda trees.
- b. *Proposed Mitigation* – None required.
- c. *Finding*– The impact(s) prior to mitigation is/are found to be:  
  
 **Significant**                       Not Significant

- d. *Rationale* – The proposed improvements under Alternative A would comply with all local construction standards and guidelines, including design guidelines for roadways, streetscape, and landscaping. This would ensure a less-than-significant impact would occur relative to potential impacts to the visual character of the project site.
- e. *Reference* – Draft EIR/EA Section 4.6 and Section 5.2.2

## 7.7 Biological Resources

### 1) **Impact BR1: Have a substantial adverse effect on any sensitive or special-status species.**

- a. *Description of Project Impacts* – Project operation would not create any new impacts related to ecologically sensitive areas and endangered species beyond existing conditions. Therefore, a less-than-significant impact related to sensitive or special status plant and animal species would occur.
- b. *Proposed Mitigation* – None required.
- c. *Finding* – The impact(s) prior to mitigation is/are found to be:

Significant                       **Not Significant**

- d. *Rationale* – Implementation of the project as proposed under Alternative A, which would involve improvements to an existing transportation corridor already used by buses and other vehicles to create peak period curbside bus lanes to accommodate existing buses, would not create any new impacts to existing biological resources, including sensitive or special-status species, in the project corridor and vicinity.
- e. *Reference* – Draft EIR/EA Section 4.7 and Section 5.2.2

### 2) **Impact BR2: Interfere with wildlife movement.**

- a. *Description of Project Impacts* – The segment of the project, where an existing eastbound left-turn pocket would be extended and the street widened between Bonsall and Federal Avenues, would involve the removal of a maximum of 30 small jacaranda trees between I-405 and Federal Avenue.
- b. *Proposed Mitigation* – None required.
- c. *Finding* – The impact(s) prior to mitigation is/are found to be:

**Significant**                       Not Significant

- d. *Rationale* – The trees between Bonsall and Federal Avenues are ornamental and would not provide suitable habitat for migratory birds. Therefore, no impacts related to migratory birds are anticipated along this segment.
- e. *Reference* – Draft EIR/EA Section 4.7 and Section 5.2.2

**3) Impact BR3: Conflict with local policies or ordinances protecting biological resources.**

- a. *Description of Project Impacts* – The project as proposed under Alternative A would remove up to 30 small jacaranda trees between I-405 and Federal Avenue to accommodate the extension of the eastbound left-turn pocket at Sepulveda Boulevard.
- b. *Proposed Mitigation* – None required
- c. *Finding* – The impact(s) prior to mitigation is/are found to be:
- Significant                       Not Significant
- d. *Rationale* – The jacaranda trees between Bonsall and Federal Avenues are ornamental and would not provide suitable habitat for migratory birds. Therefore, no impacts related to conflicts with local policies or ordinances would occur.
- e. *Reference* – Draft EIR/EA Section 4.7 and Section 5.2.2

## 7.8 Construction

**1) Impact C1: Have a substantial adverse effect on traffic circulation during project construction.**

- a. *Description of Project Impacts* – Construction vehicles would be used along the alignment to implement the project improvements identified above and would possibly impede traffic mobility in areas of construction. Traffic detours and truck routes would be required during construction. Traffic disruptions would likely occur and result in adverse effects to local traffic circulation.
- b. *Proposed Mitigation* – Mitigation Measures C-1 through C-3 below would ensure that construction-related traffic impacts would be reduced to less than significant.

**C-1** The City and County of Los Angeles shall prepare a traffic management plan to facilitate the flow of traffic during construction. The plan shall include the following:

- Implement diversions/detours to facilitate traffic flow throughout the construction zones;
- Implement traffic control devices and flagmen/traffic officers, if possible, to maintain traffic flow throughout the construction zones; and
- Implement a public outreach/education program to inform the public about the planned construction process and encourage motorists to consider alternate travel routes.

**C-2** The City and County of Los Angeles shall develop Worksite Traffic Control plans to accommodate required pedestrian and traffic movements. The plan shall include the following:

- Location of any roadway/lane or sidewalk closure;
- Traffic detours and haul routes;
- Hours of operation;
- Protective devices and warning signs; and
- Access to abutting properties.

**C-3** The City and County of Los Angeles shall develop a Construction Phasing and Staging Plan to minimize the inconvenience to businesses and motorists within the construction zones. The plan shall control the impacts of construction in any segment by limiting the areas that may be constructed at a particular time.

c. *Finding* – The impact(s) prior to mitigation is/are found to be:

**Significant**                       Not Significant

For those impacts that are found to be significant, the following additional finding is made:

**Changes or alterations have been incorporated into the project that avoid or lessen the effect.**

The lead agency lacks the jurisdiction to make the changes, but another agency does have such authority.

Specific economic, social, or other considerations make infeasible mitigation measures or project alternatives.

The impacts(s) subsequent to mitigation is/are found to be:

Significant                       **Not Significant**

d. *Rationale* – It is anticipated that construction work may temporarily reduce the capacity of, and cause delays to, the traffic flow along Wilshire Boulevard. The City and County of Los Angeles would be required to prepare and implement a Traffic Management Plan that would best serve the mobility and safety needs of the motoring public, construction workers, businesses, and community, as well as facilitate the flow of automobile and pedestrian traffic during construction. The plan would consist of a temporary traffic control plan that addresses both the transportation operations and public information components. In order to minimize the traffic impacts to the extent possible, several mitigation measures will need to be implemented along the project corridor to help mitigate the temporary construction impact to traffic and the adjacent businesses. Some of

these measures include traffic control devices and possibly flagmen and/or traffic officers, frequent street sweeping, and the implementation of diversions/detours to facilitate traffic flow throughout the construction zones. In addition, a Construction Phasing and Staging Plan would be required to control the impacts of construction in any segment by limiting the areas that may be constructed at a particular time. The goal of the construction phasing plan would be to maximize the work area under construction while minimizing the inconvenience to the businesses and motoring public. The project would be required to comply with the Holiday Moratorium, which prohibits construction work from November 15 through January 2.

A minimum of one-week advance notice would be provided to individual owners (businesses and residences), owner's agents, and tenants of buildings adjacent to work-site before impairing access to those buildings and use of adjacent public ways or prohibiting stopping and parking of vehicles. Additionally, temporary special signs would be used to mitigate the effects of construction on businesses by informing customers that merchants and other businesses are open and to provide special access directions if warranted. A minimum 3-foot pedestrian access along sidewalks would be maintained at all times.

Public awareness strategies include various methods to educate and reach out to the public, businesses, and the community concerning the project and work zone. The public component piece of the Traffic Management Plan may include organizing and hosting project briefings for area residents, local workforce, commuters and business owners; consultation with area homeowner associations, neighborhood councils, and Business Improvement Districts (BID); responding to telephone calls and e-mails; design and distribution of a project brochure; issuing construction notices to inform public of construction schedules; attending weekly construction progress meetings and reporting community concerns; working closely with affected Council Districts, as well as the Mayor's Los Angeles Business Team to mitigate concerns; issuing news releases to local media to inform public of traffic impacts: and, developing and managing a project website and/or telephone hotline.

- e. *Reference* – Draft EIR/EA Section 7.2.21 and Section 5.2.2
- 2) **Impact C2: Exposure to air pollutant emissions during project construction.**
- a. *Description of Project Impacts* – Criteria pollutant emissions during project construction would result in a less-than-significant regional air quality impact.
  - b. *Proposed Mitigation* – None required.
  - c. *Finding* – The impact(s) prior to mitigation is/are found to be:  
 Significant                       **Not Significant**
  - d. *Rationale* – Construction of the project as proposed under Alternative A has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the project site. In addition, fugitive dust emissions would result from demolition and construction activities. Mobile-source emissions,

primarily NO<sub>x</sub>, would result from the use of construction equipment. However, criteria pollutant emissions would be less than the applicable SCAQMD significance thresholds, and as such, would result in a less-than-significant regional air quality impact.

- e. *Reference* – Draft EIR/EA Section 4.2, Section 7.2.21, and Section 5.2.2
- 3) **Impact C3: Exposure to noise levels in excess of applicable standards during project construction.**

a. *Description of Project Impacts* – The project as proposed under Alternative A would increase noise temporarily along the corridor during construction. Noise during construction would primarily be generated from construction equipment. Although a less-than-significant impact would occur, noise control measures are recommended during construction to reduce the noise levels to the extent practicable in order to minimize the impact on nearby sensitive receptors.

b. *Proposed Mitigation* – Although construction noise would be temporary and limited to the duration of project construction, Mitigation Measures N-1 through N-4 identified in Section 7.4 above may be incorporated into the project contract specifications to minimize construction noise impacts. These noise control measures would help in reducing the annoyance of high noise levels at adjacent noise-sensitive land uses to the extent practicable during construction.

c. *Finding* – The impact(s) prior to mitigation is/are found to be:

Significant                       **Not Significant**

d. *Rationale* – Assuming an average noise level of 89 dBA (at 50 feet distance from roadway centerline) during excavation activities for roadway reconstruction of the curb lanes, noise levels would temporarily increase by more than 15 decibels from the typical ambient daytime noise levels measured in the project area. Although the increases in noise levels would be substantial, the increases would be intermittent and temporary during daytime hours as permitted by the City's Noise Ordinance (i.e., 7:00 a.m. to 9:00 p.m. during weekdays, and 8:00 a.m. to 6:00 p.m. on Saturdays). Therefore, it is unlikely that significant impacts on noise-sensitive uses or activities would occur.

e. *Reference* – Draft EIR/EA Section 7.2.21 and Section 5.2.2

- 4) **Impact C4: Exposure to excessive groundborne vibration or groundborne noise levels during project construction.**

a. *Description of Project Impacts* – The project as proposed under Alternative A would result in groundborne vibration or groundborne noise impacts as a result of construction activities and projected operational conditions. Vibratory compactors or rollers, pile drivers and pavement breakers can generate perceptible vibration. Heavy trucks can also generate groundborne vibration, which vary depending on vehicle type, weight, and pavement conditions.

b. *Proposed Mitigation* – None required.

- c. *Finding* – The impact(s) prior to mitigation is/are found to be:
- Significant                       **Not Significant**
- d. *Rationale* – Vibration levels due to construction activity at nearby sensitive receptors would be temporary and would be well below the significance criteria of 0.2 inches per second Peak Particle Velocity; thus, construction vibration and groundborne noise impacts would be less than significant.
- e. *Reference* – Draft EIR/EA Section 7.2.21 and Section 5.2.2

## 7.9 Cumulative Effects

### 1) Impact CE1: Cumulative impacts related to traffic.

- a. *Description of Project Impacts* – The project as proposed under Alternative A would result in regionally beneficial cumulative impacts on traffic circulation. However, the project as proposed under Alternative A would also result in cumulatively significant localized traffic impacts under CEQA.
- b. *Proposed Mitigation* – Please refer to Mitigation Measure T-1 identified in Section 7.1 above.
- c. *Finding* – The impact(s) prior to mitigation is/are found to be:

**Significant**                       Not Significant

For those impacts that are found to be significant, the following additional finding is made:

- Changes or alterations have been incorporated into the project that avoid or lessen the effect.
- The lead agency lacks the jurisdiction to make the changes, but another agency does have such authority.
- Specific economic, social, or other considerations make infeasible mitigation measures or project alternatives.**

The impacts(s) subsequent to mitigation is/are found to be:

**Significant**                       Not Significant

- d. *Rationale* – The project as proposed under Alternative A would result in significant and unavoidable impacts related to the exceedance of LOS criteria for multiple intersections in both years 2012 and 2020. Under Alternative A, seven intersections within the project study area are forecast to remain significantly affected under 2012 project conditions because no feasible mitigation measures could be identified. In addition, five intersections are forecast to remain significantly affected under 2020 project conditions because no feasible mitigation measures could be identified. As a result of the significant and

unavoidable impacts to these local intersections, the project as proposed under Alternative A would also result in significant and unavoidable cumulative impacts in terms of localized traffic circulation at these intersections.

- e. *Reference* – Draft EIR/EA Section 4.1 and Section 6.1

**2) Impact CE2: Cumulative impacts related to air quality.**

- a. *Description of Project Impacts* – The project as proposed under Alternative A would result in cumulatively beneficial air quality impacts. Less-than-significant cumulative impacts related to criteria pollutants and GHGs would result.
- b. *Proposed Mitigation* – Please refer to Mitigation Measures AQ-1 through AQ-4 identified in Section 7.2 above.
- c. *Finding* – The impact(s) prior to mitigation is/are found to be:

Significant                       Not Significant

- d. *Rationale* – The implementation of public transit projects, such as the project as proposed under Alternative A, would enhance the efficiency of existing transit services and help to remove vehicles from roadways and freeways, decreasing the VMT and the usage of fuels. Lower automobile VMT corresponds to a reduction of criteria pollutant emissions from the vehicles. The project as proposed under Alternative A would result in a net cumulative beneficial effect to regional air quality resulting from the increased transit ridership and the anticipated reduction in automobile use.

The project as proposed under Alternative A would contribute to the implementation of the adopted Air Quality Management Plan. The SCAQMD’s approach for assessing cumulative impacts is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and State Clean Air Acts. The project as proposed under Alternative A would be consistent with the AQMP, which is intended to bring the Basin into attainment for all criteria pollutants.

In addition, the mass regional emissions calculated for the project as proposed under Alternative A would not exceed applicable SCAQMD daily significance thresholds, which are designed to assist the region in attaining the applicable state and national ambient air quality standards. As such, cumulative impacts with respect to criteria pollutant emissions would be less than significant.

Moreover, the project as proposed under Alternative A would serve to reduce GHG emissions, in comparison to existing conditions, by improving existing traffic circulation and relieving existing local congestion. Implementation of prescribed mitigation measures during construction would further reduce Alternative A’s GHG emissions. As such, the project as proposed under Alternative A would not conflict with the State’s goal of reducing GHG emissions to 1990 levels by 2020. Impacts relative to GHG emissions and climate change would be less than significant. Accordingly, the contribution of the project as proposed under Alternative A to climate change/worldwide GHG emissions would be less than significant.

- e. *Reference* – Draft EIR/EA Section 4.2 and Section 6.1
- 3) Impact CE3: Cumulative impacts related to cultural resources.**
- a. *Description of Project Impacts* – The project as proposed under Alternative A would not require construction activities that would result in the potential for subsurface cultural resources to be disturbed. Accordingly, the project as proposed under Alternative A would result in less-than-significant impacts.
  - b. *Proposed Mitigation* – None required.
  - c. *Finding* – The impact(s) prior to mitigation is/are found to be:  
 Significant                       Not Significant
  - d. *Rationale* – No surficial prehistoric or historic archaeological sites or features were identified in the study area. Further, no impacts on historic properties or historical resources were identified. Therefore, the project as proposed under Alternative A would not contribute to cumulative impacts in these categories.
  - e. *Reference* – Draft EIR/EA Section 4.3 and Section 6.1
- 4) Impact CE4: Cumulative impacts related to noise.**
- a. *Description of Project Impacts* – To implement the project as proposed under Alternative A, curb lanes would be repaired or reconstructed, where necessary, and restriped and signed as peak period bus lanes. In other areas, curbside bus lanes would be added as new lanes to Wilshire Boulevard by street widening. These project elements, however, would not require major construction work, and construction vibration and groundborne noise impacts would be less than significant.
  - b. *Proposed Mitigation* – Please refer to Mitigation Measure N-1 through N-4 identified in Section 7.4 above.
  - c. *Finding* – The impact(s) prior to mitigation is/are found to be:  
 Significant                       Not Significant
  - d. *Rationale* – The project as proposed under Alternative A would increase noise temporarily along the corridor during construction. Noise during construction would primarily be generated from construction equipment. Although a less-than-significant impact would occur, noise control measures are recommended during construction to reduce the noise levels to the extent practicable in order to minimize the impact on nearby sensitive receptors. According to the traffic noise modeling results during project operation, the project as proposed under Alternative A would not cause an exceedance of City of Los Angeles or County of Los Angeles noise standards or materially worsen an existing standard violation and, as such, would not result in a significant cumulative noise impact.
  - e. *Reference* – Draft EIR/EA Section 4.4 and Section 6.1

5) **Impact CE5: Cumulative impacts related to land use.**

- a. *Description of Project Impacts* – The project as proposed under Alternative A would include general improvements to portions of Wilshire Boulevard. Proposed improvements under Alternative A would include restriping of traffic lanes, as necessary; conversion of existing curb lanes to bus lanes in each direction during peak periods; upgrade of the existing transit signal priority system; selective street widening; reconstruction/resurfacing of curb lanes in select areas; and installation of traffic/transit signage and pavement markings, as necessary, to implement dedicated peak period bus lanes. The project as proposed under Alternative A would not result in any land use impacts.
- b. *Proposed Mitigation* – None required.
- c. *Finding* – The impact(s) prior to mitigation is/are found to be:  
 Significant                       Not Significant
- d. *Rationale* – A series of general improvements would be made to Wilshire Boulevard, including the conversion of existing curb lanes to bus lanes and the upgrading of the existing transit signal priority system. These project elements, however, would not require major construction work. The project as proposed under Alternative A would not result in divisions of existing communities or significant conflicts with any applicable land use plan, policy, regulation, habitat conservation plan, or natural community conservation plan. In addition, the project as proposed under Alternative A would not result in any land use compatibility conflicts, which could have the potential to result in significant changes to the existing land use pattern. Therefore, there are no cumulative impacts to local land use plans or policies resulting from the project as proposed under Alternative A.
- e. *Reference* – Draft EIR/EA Section 4.4 and Section 6.1

6) **Impact CE6: Cumulative impacts related to aesthetics, particularly regarding the loss of trees.**

- a. *Description of Project Impacts* – The project as proposed under Alternative A would convert existing curb lanes on Wilshire Boulevard to bus and right-turn only operation in the peak periods on weekdays. The project as proposed under Alternative A would involve the extension of the eastbound left-turn pocket at Sepulveda Boulevard and street widening between Bonsall and Federal Avenues, which would affect the existing median, resulting in the removal of a number of small jacaranda trees.
- b. *Proposed Mitigation* – None required.
- c. *Finding* – The impact(s) prior to mitigation is/are found to be:  
 Significant                       Not Significant
- d. *Rationale* – The proposed improvements under Alternative A would comply with all local construction standards and guidelines, including design guidelines for

roadways, streetscape, and landscaping. This would ensure a less-than-significant cumulative impact would occur relative to potential impacts to the visual character of the project site.

e. *Reference* – Draft EIR/EA Section 4.4 and Section 6.1

7) **Impact CE7: Cumulative impacts related to biological resources, particularly regarding the loss of trees.**

a. *Description of Project Impacts* – The project as proposed under Alternative A would remove up to 30 small jacaranda trees between I-405 and Federal Avenue to accommodate the extension of the eastbound left-turn pocket at Sepulveda Boulevard.

b. *Proposed Mitigation* – None required.

c. *Finding* – The impact(s) prior to mitigation is/are found to be:

Significant                       Not Significant

d. *Rationale* – The jacaranda trees between Bonsall and Federal Avenues are ornamental and would not provide suitable habitat for migratory birds. Therefore, no cumulative impacts related to conflicts with local policies or ordinances would occur.

e. *Reference* – Draft EIR/EA Section 4.4 and Section 6.1

## 7.10 Irreversible and Irretrievable Commitment of Resources Effects

a. *Description of Project Impacts* – The construction and implementation of the project as proposed under Alternative A would entail the irreversible and irretrievable commitment of some energy and human resources, including labor required for the planning, design, construction and operation of the project.

b. *Proposed Mitigation* – None required.

c. *Finding* – The impact(s) prior to mitigation is/are found to be:

Significant                       Not Significant

d. *Rationale* – The construction and implementation of the project as proposed under Alternative A would entail the irreversible and irretrievable commitment of the following resources:

- Consumption of nonrenewable energy resources as a result of operation and maintenance of the proposed transportation improvements, even if energy rates do not exceed existing use rates;

- Commitment of natural resources during minor construction activities associated with the project as proposed under Alternative A, including the consumption of fossil fuels and the use of construction materials, and
- Removal of a maximum of 30 small jacaranda trees in the median of Wilshire Boulevard between I-405 and Federal Avenue during construction of the proposed project. However, as described in Section 4.7, required mitigation would ensure that new street trees shall be planted nearby within the project area to replace those removed during construction.

However, implementation of public transit improvement projects, such as the project as proposed under Alternative A, would help remove vehicles from roadways and freeways, easing the increase in vehicle miles traveled (VMT) and the usage of fuels. The project as proposed under Alternative A would result in less energy consumption and, as such, would result in a beneficial energy impact.

- e. *Reference* – Draft EIR/EA Section 6.3

## 7.11 Growth Inducement Effects

- a. *Description of Project Impacts* – The project as proposed under Alternative A would not spur new regional growth in terms of population or employment and would not result in significant growth-inducing impacts.
- b. *Proposed Mitigation* – None required.
- c. *Finding* – The impact(s) prior to mitigation is/are found to be:

Significant                       **Not Significant**

- d. *Rationale* – The project as proposed under Alternative A is a transportation enhancement project aimed at improving the efficiency of an existing transit system; it is not a significant new development project. In addition, the project as proposed under Alternative A involves minimal construction activities and is not anticipated to create a significant number of permanent jobs. Accordingly, the project would not result in significant growth-inducing impacts.
- e. *Reference* – Draft EIR/EA Section 6.4

## 8.0 Statement of Overriding Considerations

This section provides the rationale to support a determination by LACMTA, as lead agency under CEQA, that the benefits of the project as proposed under Alternative A outweigh the significant unavoidable environmental effects that have been anticipated to occur. This discussion, which is required by Section 15093 of the CEQA Guidelines, is organized into two subsections. In the first subsection, the significant unavoidable effects are identified, and in the second subsection, the reasons in support of the determination are presented.

### 8.1 Significant Unavoidable Impacts

The project as proposed under Alternative A would result in adverse traffic impacts that may not be avoided or mitigated. These significant unavoidable traffic impacts are identified below.

As discussed in Section 5.2.2 of the Draft EIR/EA, the following seven intersections are forecast to remain significantly affected under 2012 project conditions under Alternative A because no feasible mitigation measures that would fully reduce impacts to less-than-significant levels could be identified:

- Bundy Drive/Wilshire Boulevard;
- Veteran Avenue/Santa Monica Boulevard;
- Overland Avenue/Santa Monica Boulevard;
- Beverly Glen Boulevard/Santa Monica Boulevard;
- Westwood Boulevard/Olympic Boulevard;
- Westwood Boulevard/Pico Boulevard; and
- Fairfax Avenue/Wilshire Boulevard.

The following five intersections are forecast to remain significantly affected under 2020 project conditions under Alternative A because no feasible mitigation measures that would fully reduce impacts to less-than-significant levels could be identified:

- Veteran Avenue/Sunset Boulevard;
- Bundy Drive/Wilshire Boulevard;
- Overland Avenue/Santa Monica Boulevard;
- Fairfax Avenue/Wilshire Boulevard; and
- La Brea Avenue/Wilshire Boulevard.

For Years 2012 and 2020, a total of nine intersections are forecast to remain significantly affected after mitigation. As a result of the significant and unavoidable impacts to these local intersections within the project study area, the project as proposed under Alternative A would also result in significant and unavoidable cumulative impacts in terms of localized traffic circulation at these intersections.

## 8.2 Determination

The LACMTA has determined that the overall benefits of the Wilshire BRT Project as proposed under Alternative A outweigh and override the significant unavoidable traffic impacts at the nine intersections identified above. It should be noted that most of the delays at the nine intersections would be 15 seconds or less, but because the intersections are already operating at unacceptable levels of service, the established local threshold is very low and triggers a significant local impact resulting from delays as low as 2.5 seconds.

The reasons supporting this determination are as follows:

- Bus lanes are a key attribute of Bus Rapid Transit. Bus lanes make transit usage more attractive by reducing transit travel times, increasing service reliability, and improving safety.
- The Wilshire BRT Project would improve bus passenger travel times by allowing buses to travel in dedicated peak-period bus lanes for the majority of the alignment between S. Park View Street to the east and Centinela Avenue to the west.
- The Wilshire BRT Project would improve bus service reliability by separating buses from the already high levels of traffic congestion and intersection delays experienced along the corridor. By providing bus lanes during the peak periods when traffic is at its worst, travel times would remain relatively constant due to the bus lanes' separation from mixed-flow traffic.
- The Wilshire BRT Project would improve traffic flow along Wilshire Boulevard.
- Reconstruction of the curb lanes along damaged portions of Wilshire Boulevard would allow their effective use by buses during peak periods and by both buses and automobiles during non-peak periods to improve traffic flow along Wilshire Boulevard. This improvement would allow the curb lanes to be better utilized, help keep buses and autos moving along the corridor without the need to slow down significantly for large potholes, improve safety by reducing the need for vehicles to change lanes, avoid damage to transit vehicles and autos, and provide Metro riders with a much more pleasant transit experience. This improvement, in combination with the other project improvements, would assure the corridor's immediate and long-term success as a major transit facility.
- The improved bus passenger travel times and bus service reliability would encourage a shift from automobile use to public transit by continuing to attract new transit riders.
- The Wilshire BRT Project would improve air quality in Los Angeles County with the reduction in mobile source emissions resulting from a mode shift from automobile use to bus use.
- Beyond the Wilshire corridor, the Wilshire BRT Project would be expected to result in a beneficial effect on traffic in the metropolitan Los Angeles, particularly within the Mid-City and Westside areas, through the increased efficiency and public utilization of the Wilshire BRT system.

- The Wilshire BRT Project would increase person-throughput with the implementation of bus lanes as compared to mixed-flow curb lanes. Currently, the curb lanes can carry a maximum of 800 cars per lane per hour. With the correct average occupancy of 1.32 persons per car, the existing total person throughput with cars is 1,056 persons per lane per hour. When converted to bus lanes, the curb lanes would carry approximately 30 buses per lane per hour. The average passenger load is approximately 50 persons per bus during peak hours for the popular Metro Rapid Lines 720, 920 and Local Line 20 on Wilshire Boulevard. This would yield 1,500 persons per lane per hour for buses in each curbside bus lane. The person throughput with bus lanes (1,500) is, therefore, superior to that of mixed-flow lanes (1,056) during peak hours. This does not incorporate expected increases in bus ridership on Wilshire Boulevard after the bus lanes are implemented, which would further improve the bus lanes' person throughput. Person throughput could potentially increase anywhere from 1,725 to 1,800 persons per lane per hour for buses in each curbside bus lane.
- The Wilshire BRT Project would improve safety by reducing merge conflicts between buses and mixed-flow vehicles and by reducing the two highest causes of accidents, which involve cars hitting buses while at a bus stop or while trying to get around them.

Therefore, despite localized traffic impacts, within the larger context of the Wilshire corridor and the City of Los Angeles, the economic, legal, social, technological, and other benefits of the project as proposed under Alternative A outweigh its significant unavoidable environmental effects.