

Chapter 6 Other CEQA Considerations

6.1 Cumulative Impacts

6.1.1 Regulatory Setting

Section 15355 of the CEQA guidelines (2005) defines cumulative impacts as two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. Cumulative effects can result from individually minor, but collectively significant actions that take place over a period of time (40 CFR 1508.7). The analysis in this chapter is consistent with CEQA guidelines, Section 15130(b)(1), which directs cumulative impact analyses to include “a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact.”

6.1.2 Study Area

The Wilshire Bus Rapid Transit Project would take place along Wilshire Boulevard between Valencia Street and Centinela Avenue in the City of Los Angeles, including the portion between Veteran Avenue and Federal Avenue (0.8 mile) that is under the jurisdiction of the County of Los Angeles. The portion of Wilshire Boulevard within the City of Beverly Hills (between San Vicente Boulevard and one block west of Whittier Drive) is not included as part of the proposed project.

6.1.3 Impact Assessment

Methodology

“Cumulative impacts” refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. The individual effects may be changes resulting from a single project or a number of separate projects, whereas the cumulative impact is the change in the environment from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable future projects. Cumulative impacts can result from individually minor, but collectively significant, projects taking place over a period of time.

CEQA requires that the discussion of cumulative impacts reflects the severity of the impacts, as well as the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the proposed project alone. Further, the discussion is intended to be guided by the standards of practicality and reasonableness.

CEQA also requires an EIR to explore the long-term effects of a proposed project, those impacts which may not be tangible in the near term, but may ultimately evolve into significant adverse environmental impacts in the long term. Issues to be addressed in the EIR include the growth-inducing impacts of the proposed project and significant irreversible effects. The CEQA Guidelines state that the discussion of growth-inducing impacts should focus on the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.

An adequate discussion of significant cumulative impacts involves analyzing either (1) “a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency,” or (2) “a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact.”

This cumulative impact analysis relies on method (2) described above. This cumulative impact analysis incorporates the regional projections from the SCAG RTP. The Wilshire Bus Rapid Transit Project is located within the City of Los Angeles Subregion (the portion of Wilshire Boulevard within the City of Beverly Hills is not included as part of the proposed project). The RTP reflects transportation, population, employment, and land use data for the six-county SCAG area through the year 2035 and, thus, is an appropriate basis for the analysis of cumulative impacts.

The region wide impact analysis conducted in the RTP PEIR (SCH No. 2007061126, May 2008), serves as the basis for this analysis of cumulative impacts, per Section 15150 of the CEQA guidelines. SCAG states that lead agencies, such as the Los Angeles County Metropolitan Transportation Authority (LACMTA), may use the region-wide impact analysis contained in the RTP PEIR as the basis of their cumulative impact analysis. The RTP PEIR contains a thorough analysis of environmental impacts resulting from implementation of various transportation projects throughout SCAG’s six county region that encompasses approximately 38,000 square miles. Therefore, the RTP PEIR is used as the basis of this cumulative impact analysis and is hereby incorporated by reference per Section 15150 of CEQA guidelines.

As described in the Traffic Study, traffic volume forecasts are based upon the results of the SCAG RTP travel demand model. The model was updated and refined specifically for use in this study. The socioeconomic data in the model, for example, were refined to include large known future development projects provided by LADOT. These projects are listed in Table 6-1.

Table 6-1: Future Development Projects

Area	Location	Project Description
West LA	11122 W Pico Blvd	538 Apartments, 212,000 sf Target, 54,000 sf Supermarket
Westwood	Glendon Ave/Kinross Ave	50,000 sf Shopping Center, 350 Apartments
Central LA	Wilshire Blvd/Hoover St	156,000 tsf Shopping Center
Downtown	Figueroa St/8th Pl	836 Condos, 988,255 sf Office, 480 Hotel Rooms, 46,000 sf Retail
Downtown	Figueroa St/7th St	Korean Air project to replace Wilshire Grand Hotel with new Hotel and Office space
sf = square feet.		

Source: Iteris 2010

The cumulative impacts analysis examines the impacts of the proposed project as discussed in Sections 4.1 to 4.7 within the framework of the cumulative regional transportation analysis contained in the RTP PEIR. These impacts are summarized below.

Traffic

The proposed project and Alternative A would result in regionally beneficial cumulative impacts on traffic circulation. However, both the proposed project and Alternative A would also result in cumulatively significant localized traffic impacts under CEQA. The No Project Alternative would not result in cumulative impacts.

The RTP PEIR indicates that the region is expected to grow in both population and vehicle miles traveled (VMT). Development and redevelopment would result in increased traffic congestion, including along Wilshire Boulevard. The proposed project and Alternative A would improve the efficiency of existing transit services, which would expand regional transportation choices. The proposed project and Alternative A are aimed at improving regional quality of life and overall mobility. The proposed project and Alternative A would result in a decrease in VMT due to the increased use of transit. Therefore, the proposed project and Alternative A would result in a beneficial cumulative effect on regional traffic circulation. The No Project Alternative would neither directly affect nor contribute to a cumulative impact on regional traffic circulation nor result in any possible beneficial cumulative effect.

However, in terms of impacts of the proposed project on local traffic circulation, the proposed project and 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. As described in the Traffic Study and as summarized in Section 4.1, traffic volume forecasts are based upon the results of the SCAG RTP travel demand model, which was updated and refined specifically for use in this study. As discussed in Section 4.1, eight intersections within the project study area are forecast to remain significantly affected under 2012 project conditions because no feasible mitigation measure could be identified. In addition, nine intersections are forecast to remain significantly affected under 2020 project conditions because no feasible mitigation measure could be identified. Under Alternative A, as described in Section 5.2.2, eight intersections within the project study area are forecast to remain significantly affected under 2012 conditions, and five intersections are forecast to remain significantly affected under 2020 conditions. As a result of the significant and unavoidable impacts to these local intersections, the proposed project and Alternative A would also result in significant and unavoidable cumulative impacts in terms of localized traffic circulation at these intersections. The No Project Alternative would not result in any changes to traffic and would not contribute to a cumulative impact on local traffic circulation.

Air Quality

The proposed project and Alternative A would result in cumulatively beneficial air quality impacts. Less than significant cumulative impacts related to criteria pollutants, and GHGs would result. The No Project Alternative would not result in cumulative impacts.

The implementation of public transit projects, such as the proposed project or 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. Consistent with the RTP PEIR air quality analysis, the proposed project and 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 No Project Alternative would neither affect nor contribute to a cumulative impact on air quality nor result in any possible beneficial cumulative effect.

The Wilshire Bus Rapid Transit Project and 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. As discussed in Section 4.2, the proposed project would be consistent with the AQMP, which is intended to bring the Basin into attainment for all

criteria pollutants.¹²⁹ Similarly, Alternative A would also be consistent with the AQMP.

In addition, the mass regional emissions calculated for the proposed project and presented in Table 4.2-4 (regional construction emissions) 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. The proposed project would comply with the SCAQMD's Rule 403 (fugitive dust control) during construction, as well as all other adopted AQMP emissions control measures. Per SCAQMD rules and mandates, as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, these same requirements (i.e., Rule 403 compliance, the implementation of all feasible mitigation measures, and compliance with adopted AQMP emissions control measures) would also be imposed on all projects Basin-wide. As such, cumulative impacts with respect to criteria pollutant emissions would be less than significant. Similar to the proposed project, emissions associated with Alternative A would not exceed SCAQMD daily significance thresholds and would comply with the emissions control measures described above. Therefore, cumulative impacts with respect to criteria pollutants for Alternative A would be less than significant.

As described in Section 4.2, the proposed project 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 the proposed project's GHG emissions. As described in Section 5.2.2, Alternative A would also serve to reduce GHG emissions. As such, the proposed project and 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 either the proposed project or Alternative A to climate change/worldwide GHG emissions would be less than significant.

Cultural Resources

The proposed project and Alternative A would result in less than significant cumulative impacts on cultural resources. The No Project Alternative would not result in cumulative impacts.

The RTP PEIR indicates that a significant cumulative impact to cultural resources would result due to a substantial increase in urbanization in the

¹²⁹ CEQA Guidelines Section 15064(h)(3) states "A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g. water quality control plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency."

SCAG region. Certain transportation improvements in the RTP would result in significant impacts to historic, archaeological, and paleontological resources. Impacts to cultural resources resulting from the Wilshire Bus Rapid Transit Project and Alternative A would be mitigated to less than significant levels; the proposed project and Alternative A, therefore, would not contribute to the adverse cumulative cultural resources impacts detailed in the RTP PEIR. Under the No Project Alternative, the project corridor would remain in its current state. As no construction would occur under the No Project Alternative, there would be no potential for historic or subsurface cultural resources to be disturbed.

As described in Section 4.3, 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 proposed project would not contribute to cumulative impacts in these categories.

Regarding archaeological resources, two previously recorded historic sites, as well as the archaeological/paleontological La Brea Tar Pits site, are located in areas where construction-related activities are proposed. Even though the project area is heavily urbanized, buried cultural resources have been identified during previous construction-related ground-disturbing activities in proximity to the project route. Therefore, there is the potential for buried cultural resource deposits to exist beneath previously disturbed and developed land surfaces. However, as described in Section 4.3, compliance with Section 15064.5(c) of the CEQA Guidelines will ensure that no adverse significant impacts would occur.

In terms of potential impacts to paleontological resources resulting from the proposed project, pavement replacement is not considered a ground-disturbing activity. In addition, due to previous complications of encountering tar seepage during construction related activities in this area, the proposed ground disturbance for this project is anticipated not go beyond two feet below the surface. Therefore, no impacts would be anticipated to occur. Nevertheless, compliance with Section 15064.5(d) of the CEQA Guidelines would further ensure that no adverse significant impact would occur. Also, compliance with Section 15064.5(e) of the CEQA Guidelines would ensure that impacts to human remains would be less than significant.

As described in Section 5.2.2, Alternative A would not require construction activities that would result in the potential for subsurface cultural resources to be disturbed. Similar to the proposed project, this alternative would result in less than significant impacts.

Impacts on cultural resources, as identified above, would be avoided or reduced to a level of less than significant, in accordance with CEQA Guidelines. Therefore, the impacts would be on individual resources and would not be cumulatively considerable.

Noise

The proposed project and Alternative A would result in less than significant cumulative noise impacts. The No Project Alternative would not result in cumulative impacts.

The proposed 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 proposed project, 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 or removing jut-outs. These project elements, however, would not require major construction work, and construction vibration and groundborne noise impacts would be less than significant. Therefore, the proposed project would not contribute to cumulative noise and vibration impacts. Noise impacts from construction of Alternative A are expected to be similar to those of the proposed project. The only difference is that under Alternative A, there would be no jut-out removal activities for realignment of the curbs from Comstock Avenue to Malcolm Avenue and there would be some additional curb lane reconstruction/resurfacing. Therefore, construction noise impacts would be less along this stretch of Wilshire Boulevard under Alternative A than under the proposed project. As with the proposed project, Alternative A would not contribute to cumulative noise and vibration impacts.

The No Project Alternative would not change vibration or groundborne noise levels from existing conditions along the project corridor. Therefore, no impact would occur.

As described in Section 4.4, the proposed project is not expected to generate substantial noise above existing ambient noise levels in the project area, which is attributed mainly to traffic on Wilshire Boulevard. The only element of the project that would have the potential to change the existing noise setting would be any changes to traffic that result from the proposed project. The traffic noise analysis conducted for the proposed project was based on cumulative traffic conditions predicted to occur in the project area. The proposed project would not increase traffic noise by more than 1 dB along Wilshire Boulevard within the project corridor, and, thus, the City of Los Angeles and County of Los Angeles noise compatibility standard would not be exceeded (See Table 4.4-9). Similarly, since traffic noise levels would not increase by more than 1 dBA for Alternative A, traffic noise associated with this alternative would also result in less than significant impacts. Therefore, the proposed project and Alternative A are not considered to contribute to a significant cumulative noise impact during operation.

Land Use

The proposed project, Alternative A, and the No Project Alternative would not result in cumulative impacts related to land use.

Projects included in the RTP are intended to increase the overall accessibility and mobility of persons within the SCAG region. The Wilshire Bus Rapid Transit Project would contribute to the beneficial impact of increased accessibility to community resources, businesses, and residences and increased mobility along Wilshire Boulevard.

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 proposed project 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 proposed project 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. Alternative A would include transportation improvements to portions of the Wilshire Corridor that are similar to the proposed project. Therefore, there are no cumulative impacts to local land use plans or policies resulting from the Alternative A.

The No Project Alternative would not implement any of the improvements proposed by the project or under Alternative A. Therefore, the No Project Alternative would neither directly affect nor contribute to a cumulative impact on land use nor result in any possible beneficial cumulative effect.

Aesthetics (Loss of Trees)

The proposed project and Alternative A would result in less than significant cumulative impacts related to visual quality and character. The No Project Alternative would not result in cumulative impacts.

As described in Section 4.6, the implementation of **Mitigation Measure A-1** would ensure that no significant cumulative visual impacts resulting from the proposed project would occur due to the loss of landscaping and trees associated with the removal of jut-outs between Comstock Avenue and Malcolm Avenue and the roadway widening between Sepulveda Boulevard and Federal Avenue. Under Alternative A, the jut-outs would not be removed between Comstock Avenue and Malcolm Avenue, and, therefore, no trees would be removed in this area. BRT operations are already occurring along the project alignment. The proposed project and Alternative A would create peak period bus lanes to accommodate existing buses. Accordingly, no significant adverse changes to the visual character or the visual quality of the Wilshire corridor would occur either individually or cumulatively.

Under the No Project Alternative, the improvements under the proposed project would not be implemented. No construction activities would take

place, no street facilities would be altered, and, therefore, no cumulative visual impacts would occur.

Biological Resources (Loss of Trees)

The proposed project would result in less-than-significant cumulative impacts to biological resources after mitigation. Alternative A would result in less than significant cumulative impacts related to biological resources. The No Project Alternative would not result in cumulative impacts.

Tree removal along the project corridor could result in impacts to migratory birds and their active nests. Construction activities as a result of the proposed project and other projects in the area could potentially result in significant cumulative impacts to migratory birds. As described in Section 4.7, **Mitigation Measure BR-1** has been identified to ensure that impacts to nesting birds are reduced to less than significant levels. Therefore, a cumulatively significant impact to nesting birds, or their habitat, would not be expected to occur.

As stated in Section 5.2.2, operation of Alternative A would not create any new impacts related to ecologically sensitive areas and endangered species beyond existing conditions. Furthermore, Alternative A would avoid impacts to existing street trees on the jut-outs between Comstock Avenue and Malcolm Avenue that have been identified as potential migratory bird nesting habitat. Therefore, a less-than-significant cumulative impact would occur under Alternative A.

6.2 Summary of Significant Unavoidable Impacts

Section 15126.2(b) of the CEQA Guidelines requires an EIR to document significant environmental effects which cannot be avoided if the proposed project is implemented. Specifically, Section 15126.2(b) states that the EIR should:

Describe any significant impacts, including those, which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

Environmental impacts associated with implementation of a project may not always be mitigated to a level that is considered less than significant (either through the imposition of project-specific mitigation measures or through the imposition of an alternative project design). In such cases, a Statement of Overriding Considerations must be prepared prior to approval of the project, in accordance with CEQA Guidelines Sections 15090 and 15093. Because implementation of the proposed project would create significant, unavoidable impacts, a Statement of Overriding Considerations is required to describe specific reasons for approving the project, based on information contained

within the Final EIR, as well as any other information in the public record. Based on information contained in this EIR, the following are the significant and unavoidable impacts of the proposed project:

As discussed in Section 4.1, the following eight intersections are forecast to remain significantly affected under 2012 project conditions 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;
- Veteran Avenue/Santa Monica Boulevard;
- Overland Avenue/Santa Monica Boulevard;
- Westwood Boulevard/Pico Boulevard;
- Overland Avenue/Pico Boulevard;
- Fairfax Avenue/Wilshire Boulevard; and
- La Brea Avenue/Wilshire Boulevard.

The following nine intersections are forecast to remain significantly affected under 2020 project conditions 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;
- Veteran Avenue/Santa Monica Boulevard;
- Overland Avenue/Santa Monica Boulevard;
- Westwood Boulevard/Olympic Boulevard;
- Westwood Boulevard/Pico Boulevard;
- Overland Avenue/Pico Boulevard;
- Fairfax Avenue/Wilshire Boulevard; and
- La Brea Avenue/Wilshire Boulevard.

As a result of the significant and unavoidable impacts to these local intersections within the project study area, the proposed project would also result in significant and unavoidable cumulative impacts in terms of localized traffic circulation at these intersections.

Similarly, as discussed in the Traffic Study, and in Section 5.2.2, Alternative A would result in significant unavoidable impacts at eight intersections in year 2012, and five intersections in year 2020. Therefore, Alternative A would have a lesser but still significant unavoidable impact on localized traffic circulation.

6.3 Significant Irreversible Environmental Changes

Section 15126.2(c) of the State CEQA Guidelines requires an EIR to consider any significant irreversible environmental changes that would be caused by the proposed project should it be implemented. Specifically, Section 15126.2(c) states that:

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

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

However, the construction and implementation of the proposed project or 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 proposed project or Alternative A. These resources include the following:

- 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 proposed project or Alternative A, including the consumption of fossil fuels and the use of construction materials, and
- Removal of a maximum of 40 street trees along Wilshire Boulevard, between Comstock Avenue and Malcolm Avenue, and up to 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.

6.4 Growth-Inducing Impacts

The projects outlined in the RTP would contribute to new growth or the intensity of development within the SCAG region. The SCAG region is expected to grow in population by 33 percent (or 5.9 million persons) between 2005 and 2035. Likewise, employment in the region is expected to grow by 32 percent during the same time period. The proposed project or Alternative A, however, is a transportation enhancement project aimed at improving the efficiency of an existing transit system; it is not a significant new development project. Also, the proposed project or Alternative A involves minimal construction activities and is not anticipated to create a significant number of permanent jobs. The proposed project or Alternative A would, therefore, not spur new regional growth in terms of population or employment and would not result in significant growth-inducing impacts.

6.5 Effects Not Found to Be Significant

CEQA Guidelines requires that an EIR contain discussion indicating the reasons that certain possible significant effects of a project were determined to be less than significant and thus, were not analyzed in the EIR. Discussions of those impacts found not to be significant are provided below:

6.5.1 Aesthetics

Scenic vistas and views, including the Hollywood Hills, the Santa Monica Mountains, and the downtown Los Angeles skyline are visible from portions of the Wilshire corridor. However, the proposed project or Alternative A would not include construction of any structures or other elements that would result in the obstruction of these views and vistas. Therefore, these potential aesthetic impacts were not found to be significant.

The project corridor is located in a developed urban area with a number of historically significant structures. Of the 18 resources that were identified in the historic survey, six were determined eligible for listing on the National Register of Historic Places. However, the proposed project or Alternative A would not include elements, such as structures or other vertical visual features, that would significantly affect or visually obstruct scenic resources in the project area. Additionally, the proposed project or Alternative A would not include elements that would potentially obstruct views of far-off scenic features or structures and places or introduce a substantial new amount of lighting on Wilshire Boulevard. Impacts to views and scenic vistas and lighting would be considered less than significant.

Under the proposed project, the proposed curb improvements between Comstock Avenue and Malcolm Avenue along the portion of the corridor in the Westwood area could result in the removal of a maximum of 25 magnolia trees. See Section 4.6 for discussion of potential aesthetic impacts related to visual quality and character resulting from proposed tree removal.

6.5.2 Agriculture

The proposed project or Alternative A would be implemented along the Wilshire corridor. The Wilshire corridor is not zoned for agricultural uses or subject to any Williamson Act contracts. The proposed project or Alternative A would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. Therefore, agricultural impacts were not found to be significant.

6.5.3 Biological Resources

The project corridor is located within a highly developed urban area, where there are few suitable habitats for wildlife. As such, there are no expected impacts related to ecologically sensitive areas, sensitive or special-status species, or riparian habitats. The project corridor is not located within or adjacent to any areas that would be considered a wetland as defined by Section 404 of the Clean Water Act. Therefore, these potential biological resource impacts were not found to be significant.

The segment of the proposed project, where jut-outs are proposed to be removed, would involve the removal of a maximum of 40 magnolia trees along Wilshire Boulevard between Comstock Avenue and Malcolm Avenue, which may serve as habitat for migratory birds. According to the Migratory Bird Treaty Act (MBTA), it is unlawful at any time, by any means, or in any manner to pursue, hunt, take, capture, or kill migratory birds. The law applies to the removal of nests occupied by migratory birds during the breeding season. See Section 4.7 for discussion of potential impacts to migratory birds that could result from proposed tree removal.

6.5.4 Geology/Soils

The proposed project or Alternative A would involve improvements to an existing transportation corridor already used by buses and other vehicles. Implementation of the proposed project or Alternative A would not create any new impacts related to fault rupture and seismic ground shaking beyond existing conditions. No new structures would be exposed to fault rupture or liquefaction.

As the project corridor is currently paved, the potential for soil erosion is low. Additionally, the project corridor is not located in a landslide area. Implementation of the proposed project or Alternative A would not create any new impacts related to lateral spreading, subsidence, liquefaction, collapse, or expansive soils beyond existing conditions. Septic tanks would not be used under the proposed project or Alternative A. Therefore, geological impacts were not found to be significant.

6.5.5 Hazards and Hazardous Materials

The proposed project or Alternative A would not require the removal of significant (greater than 2 feet below the surface) soil or ground excavation.

Based on the historic commercial use, there is a potential that some soils and/or groundwater may be contaminated below the surface of the corridor. However, based on the extent of proposed excavation, it is not likely that any potentially contaminated soil and/or groundwater would be disturbed.

No new hazards or hazardous materials would be introduced under the proposed project or Alternative A since the same types and numbers of buses would continue to operate. As such, project operation would not create any new impacts to schools related to the use of hazardous materials beyond existing conditions.

The Cortese list was reviewed for any sites located within or in the vicinity of the project corridor, and no such sites were identified. However, a review of the list of Leaking Underground Storage Tanks (LUST) and other cleanup sites identified 12 sites that are located along the project corridor.

However, it is highly unlikely based on the extent of ground disturbance required for the project that any potentially contaminated soil and/or groundwater would be disturbed as a result of the construction for the proposed project or Alternative A. It is also not likely that methane gas would be encountered. No impact related to emergency response or evacuation plans is anticipated to occur. Therefore, any potential hazard/hazardous materials impacts were not found to be significant.

6.5.6 Hydrology/Water Quality

The proposed project or Alternative A would neither create nor contribute to water quality degradation. Project construction would comply with applicable federal, State, and local regulations, as well as other code requirements and permit provisions to prevent any violation of water quality standards or waste discharge requirements.

The Wilshire corridor is entirely paved and does not allow groundwater recharge. Therefore, the proposed project or Alternative A would not deplete or degrade groundwater resources or result in any reduction in groundwater. Project operation would not create any new impacts related to stormwater quality and storm drainage system capacity beyond existing conditions. . Implementation of the proposed project or Alternative A would not create any new impacts related to flooding due to dam failure beyond existing conditions. Therefore, any potential hydrology or water quality impacts were not found to be significant.

6.5.7 Mineral Resources

According to the City of Los Angeles General Plan Safety Element Appendix E, portions of the Wilshire corridor are underlain with oil resources. These include the area in the vicinity of the intersection of Wilshire Boulevard and Hoover Street, the area between La Brea Avenue and Fairfax Avenue, and the area just west of the Beverly Hills/Los Angeles city boundary.¹³⁰ Project

¹³⁰ City of Los Angeles. Los Angeles General Plan Safety Element, Appendix E. May, 1994.

construction would not increase the rates of existing oil extraction or affect production and abandonment plans for any of the oil resources in the project area. Therefore, mineral resource impacts were not found to be significant.

6.5.8 Population and Housing

The proposed project or Alternative A would not include a housing element. It is not anticipated that the proposed project or Alternative A would induce a direct substantial population growth as it would not provide additional housing units to the area. Project operation would not create any new impacts related to population and housing beyond existing conditions. Therefore, impacts related to population growth were not found to be significant.

6.5.9 Public Services

Temporary police and fire access impacts would be minimized with the implementation of a Traffic Management Plan (TMP) during the construction period of the proposed project or Alternative A. The proposed project or Alternative A would not result in the acquisition of any parcels and, as such, would not result in the displacement of existing LAPD or LAFD facilities. Additionally, the proposed project or Alternative A could result in a beneficial impact to fire and police services by converting two existing lanes used for mixed-flow or, in some cases, for parking. The proposed project or Alternative A would not cause an additional demand on local schools, libraries, or parks. Therefore, impacts related to public services were not found to be significant.

6.5.10 Recreation

The proposed project or Alternative A would not include a housing component, and, therefore, increased demand on existing neighborhood and regional parks or other recreational facilities is not anticipated to occur. The current existing bus routes serving the Wilshire corridor would continue to operate and would not require new or additional employees. Therefore, impacts related to recreation were not found to be significant.

6.5.11 Utilities

The proposed project or Alternative A would not create additional land uses that would require additional water consumption or generate additional wastewater, and as such, would not require additional water or wastewater utility infrastructure. The proposed project or Alternative A would neither create nor contribute to any new impacts related to water consumption or wastewater generation and treatment beyond existing conditions. Additionally, the proposed project or Alternative A would neither create nor contribute to any increase in stormwater runoff that would exceed the storm drain system capacity. Similarly, the proposed project or Alternative A would neither create nor contribute to any new impacts related to solid waste

disposal beyond existing conditions. Therefore, impacts related to utilities were not found to be significant.