6.0 Other Statutory Considerations

This section provides a discussion of other statutory requirements under CEQA. These topics include a discussion of growth-inducing impacts, significant irreversible environmental changes, impacts found not significant, and the identification of significant and unavoidable impacts.

6.1 Growth-Inducing Impacts

In accordance with Section 15126.2(d) of the CEQA Guidelines, an EIR must:

Discuss 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. Included in this are projects which would remove obstacles to population growth...Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental impacts. Also discuss the characteristics of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

Substantial growth impacts could be manifested through the provision of infrastructure or service capacity to accommodate growth beyond the levels currently permitted by local or regional plans and policies. In general, growth induced by a project is considered a significant impact if it directly or indirectly affects the ability of agencies to provide needed public services or if it can be demonstrated that the potential growth significantly affects the environment in some other way.

In parallel with project implementation, SCRRA is currently developing the SCORE Program, a $10 billion plan that identifies the need for substantial investments in rail infrastructure in the Southern California region to upgrade the Metrolink system and meet the current and future needs of the traveling public. The proposed project is a critical component of the SCORE Program, providing capacity enhancements to accommodate the forecasted increase in train movements and associated passenger volumes at LAUS.

The proposed project would generate employment opportunities during the construction and operational phases of the project. The proposed project is expected to result in approximately 4,500 jobs per year during the construction phase, which would create short-term jobs for Los Angeles County and help in lowering the current rates of unemployment. The above-grade passenger concourse and new expanded passageway includes up to 160,000 square feet of transit-serving retail uses and approximately 30,000 square feet of office/commercial uses. While the proposed project would generate additional employment opportunities within the new passenger concourse and additional rail services, the majority of these jobs are expected to be filled by residents of Los Angeles and surrounding communities. Link US is identified in the
2016 RTP/SCS and would not generate substantial growth from that already planned for in the 2016 RTP/SCS.

The proposed project would complement planned development in the project study area consistent with the City’s General Plan and CCNCP, which encourage the transit orientation of Downtown Los Angeles and direct growth to areas served by infrastructure and transit near LAUS. Businesses from other areas of the region could be drawn to the immediate area surrounding LAUS because of the multimodal opportunities and increased pedestrian activity around the station, as well as additional visitors passing through the area, especially following the introduction of the planned HSR system as early as 2033. The type of future land use development that could occur around LAUS would most likely be transit oriented, consisting of mixed-use residential, office, and commercial development designed to maximize access to public transportation.

While the proposed project would include the construction of additional transportation infrastructure, the majority of infrastructure is proposed within an existing transportation corridor, and at the existing LAUS facility, which is defined in the 2016 RTP/SCS as a high quality transit area and a transit priority area in a highly urbanized area. Furthermore, the proposed project would facilitate the forecasted increase in train movements through LAUS. There is no lack of existing infrastructure in the project study area that would serve as an obstacle to growth. Projected population growth would occur in the project study area with or without the additional infrastructure associated with the project. In addition, potential growth is already planned for in the project study area and captured at the local level in the ADSP and at the regional level in the 2016 RTP/SCS.

Based on the analysis provided above, the proposed project would accommodate the forecasted increase in train movements and passenger volumes through LAUS. Any future population growth in the region and/or project study area (i.e., future land use development) is anticipated to be consistent with the City’s General Plan and CCNCP. Therefore, the proposed project would not induce unplanned growth that could otherwise result in significant or adverse secondary impacts.

### 6.2 Significant Irreversible Environmental Changes

Section 15126.2(c) of the CEQA Guidelines requires an EIR to address any significant irreversible environmental changes that may occur as a result of project implementation. CEQA requires that irreversible and irretrievable commitment of resources be addressed for certain categories of projects, including “[t]he adoption, amendment, or enactment of a plan, policy, or ordinance of a public agency” (CEQA Guidelines CCR Sections 15127(a)).

Irreversible and irretrievable resource commitments are related to the use of nonrenewable resources and the impacts that this use could have on future generations. Commitments of resources could be current, as well as future. Future commitments of resources would be associated with the secondary effect of growth-inducing impacts. Irreversible impacts result primarily from the use or destruction of a specific resource (e.g., energy and minerals) that cannot be replaced within a reasonable time frame. Irretrievable resource commitments involve the loss in value of an affected resource that cannot be restored as a result.
of the action (e.g., extinction of a threatened or endangered species or the disturbance of a cultural resource).

Resources, such as timber used for the construction of the new above-grade passenger concourse, are generally considered renewable and would ultimately be replenished. Human resources are also considered a renewable resource. Non-renewable resources, such as petrochemical construction materials, steel, copper, lead and other metals, gravel, concrete, and other materials, are typically considered finite and would not be replenished over the lifetime of the project.

The construction and implementation of the proposed project would entail the irreversible and irretrievable commitment of some land and energy and human resources, including labor required for the planning, design, construction, and operation of the proposed project. These resources include the following:

- Commitment of land for transportation purposes
- Commitment of natural resources during construction activities associated with the project, including the use of construction materials (e.g., steel, concrete, etc.)
- Consumption of nonrenewable energy resources, mainly diesel and electricity, as a result of construction, operation, and maintenance of the proposed improvements

The land used for the proposed project would continue the existing commitment of land in the area for transportation purposes. To the extent that this commitment would be for long-range use, it would be an irreversible commitment. In the event that a greater need would arise for the land in the future, or the corridor was no longer needed, the land could conceivably be converted to some other use. Currently, there is no reason to expect that such a need for conversion would ever be necessary or desirable.

In terms of the proposed project’s commitment of resources, there are several resources, both natural and built, that would be expended during the construction and operation of the project. The proposed project would result in a short term increase in the use of energy to manufacture, deliver, and construct the proposed improvements. The manufacturing of materials used to construct the proposed project and energy in the form of natural gas, petroleum products, and electricity consumed during construction and operation would contribute to the incremental depletion of renewable and non-renewable resources. Steel, concrete, and other materials would be recycled, to the extent feasible; however, the loss of these resources is considered irreversible because their reuse for some other purpose than the proposed project would be highly unlikely or impossible. Based on these considerations, the project constitutes an irreversible and irretrievable commitment of natural resources.

The proposed project’s use of non-renewable energy sources, such as diesel fuel, is considered an irreversible, irretrievable commitment of these petroleum resources. The commitment of resources to construct and operate the proposed project is based on the belief that residents, employees, and visitors would benefit from the improved efficiency, accessibility, safety, and environmental quality of the transportation system in Southern California. These benefits are anticipated to substantially outweigh any irreversible or irretrievable commitments of resources.
6.3 Effects Found Not Significant

In accordance with Section 15128 of the CEQA Guidelines, an EIR must contain a statement briefly indicating the reasons that various potential significant impacts of a project were determined not to be significant. Metro has determined that the Draft EIR project and Final EIR proposed project would not have the potential to cause significant impacts associated with the resource issue areas identified below.

6.3.1 Agriculture and Forestry Resources

Farmlands – The project study area is in an urban area that is developed with transportation infrastructure (e.g., LAUS, railroad tracks, US-101, and I-10), commercial and industrial buildings, residential apartment buildings, and government buildings. According to the 2014 Los Angeles County Important Farmland Map, the project study area is designated as Other Land (California Department of Conservation 2016c). In addition, there are no Williamson Act contract lands in the project study area (California Department of Conservation 2016a).

The majority of the project study area is designated for Hybrid Industrial, Public Facilities, Regional Center Commercial, and Heavy Manufacturing uses. There is no agricultural, forest, or timberland uses or zoning designations in the project study area. No temporary or permanent impacts on farmlands or other agricultural resources would occur during construction or operation of the proposed project.

Forest Land/Timberlands – The project study area does not include any forest land (i.e., land with 10 percent tree coverage, as defined in PRC Section 12220(g)) or timberland (i.e., land that is available for growing a crop of trees intended for commercial use, as defined in PRC Section 4526). Therefore, no temporary or permanent impacts on forest land/timberland resources would occur during construction or operation of the proposed project.

6.3.2 Mineral Resources

The project study area is located generally north of Union Station Oil Field. Union Station Oil Field was discovered in 1967. This field is represented by a generally east-west trending anticline, a structural feature (elongated dome) that traps petroleum and related compounds (i.e., crude oil and natural gas). Surface locations of most wells (directionally drilled wells) are south of the project study area along Garey Street, south of First Street. Because the operating well sites are located outside of the project study area, recovery of natural resources would not be affected.

Based on a review of Exhibit A: Mineral Resources of the Conservation Element of the City of Los Angeles General Plan, a portion of the project study area is located within Mineral Resources Zone-2 (City of Los Angeles 2001). The Mineral Resources Zone-2 contains potentially significant sand and gravel deposits which are to be conserved. However, much of the area within Mineral Resources Zone-2 in Los Angeles was developed with structures prior to the Mineral Resources Zone-2 classification, and therefore, are unavailable for extraction (City of Los Angeles 2001). The project study area is located within an urbanized area of the City of Los Angeles and is currently developed. The mining of such materials within an urbanized
environment is not practical. Based on this context, the proposed project would result in no impact on mineral resources.

6.3.3 Population and Housing

No residential displacements would be required to implement the proposed project. Therefore, the proposed project would not result in the displacement of substantial numbers of people or housing and would not require the construction of replacement housing elsewhere. No impact would occur associated with population and housing.

6.3.4 Recreation

Implementation of the project would not increase the demand for recreational facilities, or result in physical impacts that would deteriorate existing facilities. The demand for parklands and other recreational facilities would be similar to existing conditions. The proposed project would not substantially induce population growth in the project study area and thereby would not significantly increase the use of parks. No impact would occur associated with the physical deterioration of parks and other recreational facilities.

6.4 Significant and Unavoidable Environmental Impacts

Section 15216.2(b) of the CEQA Guidelines requires EIRs to include a discussion of any significant environmental impacts that cannot be avoided if the project is implemented. Sections 3.2 through 3.13 of this EIR provide a detailed analysis of all significant environmental impacts related to the Draft EIR project; identifies feasible mitigation measures, where available, that could avoid or reduce these significant impacts; and presents a determination whether these mitigation measures would reduce these impacts to a level less than significant. Section 4.0, Cumulative Impacts, of this EIR identifies the significant cumulative impacts resulting from the combined impacts of the Draft EIR project and related projects considered in cumulative analysis. Additionally, Table 2-3, Section 10.0, and Appendix P of this Final EIR provide an environmental evaluation of the Final EIR project relative to the potential impacts, mitigation measures, and significance determination. If a specific impact in either of these sections cannot be fully reduced to a less than significant level, it is considered a significant and unavoidable impact.

Implementation of the Draft EIR proposed project would result in significant and unavoidable impacts in the following issue areas: transportation, air quality, noise, and cultural resources. The following impacts associated with the Draft EIR project would be significant and unavoidable even after the implementation of mitigation.

Construction (Short-Term)

- Air quality (construction emissions would exceed the SCAQMD's daily criteria pollutant and localized significance thresholds)
- Noise (construction daytime and nighttime noise levels would exceed thresholds at William Mead Homes and Mozaic Apartments)
6.0 Other Statutory Considerations

Operations (Long-Term)

- Transportation (increased delays at one intersection [Intersection #2: Garey Street and Commercial Street] in the 2031 and 2040 with project conditions would exceed LADOT guidelines)
- Cultural resources (substantial adverse change in the significance of the following historical resources: LAUS and Vignes Street Undercrossing and Friedman Bag Company – Textile Division Building)

Implementation of the Final EIR project would result in significant and unavoidable impacts in the following issue areas: air quality, noise, and cultural resources. Previously identified significant and unavoidable transportation impacts are avoided with the Final EIR project. The following impacts associated with the Final EIR project would be significant and unavoidable even after the implementation of mitigation.

Construction (Short-Term)

- Air quality (construction emissions would exceed the SCAQMD’s daily criteria pollutant and localized significance thresholds)
- Noise (construction daytime and nighttime noise levels would exceed thresholds at William Mead Homes and Mozaic Apartments)

Operations (Long-Term)

- Cultural resources (substantial adverse change in the significance of the following historical resources: LAUS and Vignes Street Undercrossing and Friedman Bag Company – Textile Division Building)

If the Metro Board approves the project with significant and unavoidable impacts, Metro is required under CEQA to prepare a statement of overriding considerations.