6. Alternatives

6.1 INTRODUCTION

CEQA requires an analysis of alternatives to the Proposed Project to reduce or eliminate significant impacts associated with project development. Section 15126.6(a) of the CEQA Guidelines states:

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

The range of feasible alternatives is selected and discussed in a manner intended to foster meaningful public participation and informed decision making. Among the factors that may be taken into account when addressing the feasibility of alternatives are environmental impacts, site suitability, economic viability, availability of infrastructure, general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the proponent could reasonably acquire, control, or otherwise have access to an alternative location.

An EIR must briefly describe the rationale for selection and rejection of alternatives. The Lead Agency may make an initial determination as to which alternatives are feasible, and, therefore, merit in-depth consideration. Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the project objectives, are infeasible, or do not avoid any significant environmental effects.

6.2 PROJECT-LEVEL IMPACTS

As addressed in this Draft EIR, the Proposed Project would not create significant and unavoidable impacts. The Proposed Project would create potentially significant impacts, which could be mitigated to less-than-significant levels with implementation of feasible mitigation measures, on the following environmental issue areas:

Transportation

Construction and Operations. The Proposed Project was developed to improve mobility and regional transit system access while supporting community plans and transit-oriented community goals. Accordingly, the Proposed Project is generally consistent with applicable programs, plans, ordinances and policies addressing the circulation system related to transit,



roadways, bicycles, and pedestrians. The Proposed Project would result in construction effects like those experienced for a typical roadway project. These construction effects could include inconveniences associated with temporary disruptions to existing travel patterns and temporary access limitations. Mitigation Measures TRA-1 through TRA-4 would reduce potential construction impacts on transit, traffic, bicycle, and pedestrian circulation by requiring a Traffic Management Plan. In addition, lane closures, traffic detours, and designated truck routes associated with construction could temporarily result in decreased access and delayed response times for emergency services. Mitigation Measure TRA-6 would reduce potential construction impacts on emergency vehicle access by requiring early notification and coordination with emergency service providers as part of the Traffic Management Plan.

Operation of the Proposed Project would not result in significant impacts related to transit, traffic circulation or pedestrian facilities. The Proposed Project would improve transit operations by providing a new BRT service with connections to other transit services and modes in the region resulting in higher transit ridership. Similarly, the Proposed Project is anticipated to result in an overall VMT reduction over existing conditions and in the future resulting in modest improvements in regional traffic conditions benefiting the circulation system as a whole. While lane configurations along the Proposed Project route would be reconfigured to provide dedicated bus lanes along various segments of the Project route as well as other lane conversions, the overall circulation network is anticipated to improve. Emergency vehicle access would not be affected as the bus lanes would be available to emergency vehicles possibly allowing for improved response times. The Proposed Project would provide enhancements to pedestrian circulation by installing signalized marked crosswalks and reconstructing sidewalks to accommodate new stations/platforms while also serving pedestrian movements.

Regarding bicycle facilities, the Proposed Project would generally enhance bicycle facilities while also incorporating BRT facilities in the street ROW. At certain locations existing bicycle lanes would be removed (i.e., Broadway in Glendale), rerouted behind BRT station areas to avoid conflicts (i.e., Colorado Boulevard in Eagle Rock), or converted into shared bus/bicycle lanes (i.e., Colorado Boulevard in Eagle Rock). Generally, bicycles would be allowed to utilize dedicated bus lanes resulting in overall safety improvements for bicyclists travelling as there are lower volumes of buses in dedicated bus lanes as there are vehicles in general purpose lanes thus reducing potential bicycle/vehicle conflicts. However, the conversion of the existing Class II bicycle lanes on Colorado Boulevard in Eagle Rock would degrade the travel experience and may not be consistent with the City of Los Angeles Mobility Plan 2035. Mitigation Measure TRA-5 would ensure that the Proposed Project is designed in a manner that is consistent with Mobility Plan 2035 avoiding potential conflicts between the Proposed Project operations and bicycles. Examples of specific design provisions include: (1) maintaining minimum standard sizing of traffic handling features, (2) configuring transition zones to provide adequate length for maneuvering and maintaining adequate sight distance at conflict points, (3) routing of bicycles behind sidewalk station loading zones where applicable, (4) use of colored pavement markings to minimize intrusion into the bus and bicycle lanes where applicable, and (5) provision of appropriate warning and regulatory signage.

Aesthetics

Operations. The Proposed Project would result in permanent alterations to the street where bus lanes are proposed and along sidewalks and medians where station platforms are proposed. Landscaped medians along Glenoaks Boulevard would undergo modifications as a result of the Proposed Project. Portions of the median along Glenoaks Boulevard would be removed to allow for station platforms and transition lanes for BRT station approaches as well as left turn pockets. Some trees within the landscaped median as well as existing landscaping would be removed as a result; however, the majority of the median and associated landscaping would remain unaffected by the Project. In addition, the Proposed Project would install additional landscaping and median extension/jersey barriers at left-turn approaches to ensure safety but also to compensate for the loss of portions of the median. Mitigation Measure CUL-1 would reduce potential visual impacts related to the removal or relocation of the potentially historic Central Avenue and Broadway streetlights by ensuring that the Proposed Project design would be consistent with Rehabilitation Standards for historic resources damaged or relocated within the Project Area.

The Colorado Boulevard Hybrid Side-and-Center Running Configuration Option in the Eagle Rock community would replace the existing median with the proposed center-running bus lanes and associated station platforms at Caspar Avenue and Townsend Avenue. While the existing median and associated landscaping would be removed as a result of the Configuration Option, new median and center lane landscaping amenities would be installed for safety purposes but would also offset some of the loss in visual resources. Given the Eagle Rock community's expressed sensitivity to the loss of the median and associated visual resources and the substantial degree to which visual resources in would be affected, without mitigation, the Proposed Project with the Colorado Boulevard Hybrid Side-and-Center Running Configuration Option (Route Option F1) would result in a significant impact related to operational activities. Mitigation Measures VIS-1 and VIS-2 would reduce potential visual impacts by requiring landscaping and streetscape beautification.

Biological Resources

Construction. Construction activities would include vegetation removal, pedestrian and vehicle movement, staging, and paving within the biological study area, which could result in direct and indirect impacts on special-status wildlife species if these activities were to be conducted while wildlife species are within or adjacent to the affected areas. Special-status birds and mammals are known to use the trees and open areas in the biological study area for foraging and roosting. Removal of trees and habitat and increased noise, vibration, carbon dioxide, and human activity could result in direct and indirect impacts to special-status wildlife species. Therefore, without mitigation, the Proposed Project would result in a less-than-significant impact related to construction activities. Mitigation Measure BIO-1 would mitigate inadvertent impacts to biological resources during construction activities by ensuring compliance with the MBTA and California Fish and Game Code (Sections 2126, 3503, 3513, and 3800).



Cultural Resources

Construction and Operations. Along Central Avenue and Broadway, the Proposed Project would be side or curb-running and proposed station platform footprints may result in the removal or relocation of potentially historic streetlights currently within the existing sidewalk. Conceptual engineering plans developed to support the Draft EIR show proposed station platform footprints that appear to conflict with the placement of approximately three potentially historic streetlights on Central Avenue and approximately three on Broadway. These include two streetlights at the northeast corner and one streetlight at the southwest corner of Central Avenue at Lexington Drive, one streetlight at the northwest corner of Broadway at Glendale Avenue, and two at the southeast corner of Broadway at Brand Boulevard. These six streetlights are similar in appearance to historic streetlights elsewhere on the street, although research suggests some may have been recently installed (or reinstalled) as early as 2007 or as recent as 2014, depending on the location. Regardless, at this time in the planning process, it is possible that the Proposed Project would interfere with potentially historic streetlights. Therefore, without mitigation, the Proposed Project would result in a significant impact related to construction activities. Mitigation Measure CUL-1 would ensure that the Proposed Project design would be consistent with Rehabilitation Standards.

The Proposed Project would operate within the existing public ROW and would not directly affect historic resources. However, components of the Proposed Project would be constructed within the setting of known and potential historical resources. These components, such as stations and signs, have the potential to visually affect historic resources. Potential impacts to historical resources would primarily be limited to changes in setting at the location of station platforms, where shade structures and other vertical features would be constructed. It is anticipated that station platforms would be designed in a manner that is consistent with the Rehabilitation Standards. However, a qualified architectural historian would be needed to confirm if the appearance and placement of new features would not materially alter in an adverse manner those physical characteristics of a historical resource that conveys its historical significance. Therefore, without mitigation, the Proposed Project would result in a significant impact related to operational activities. Mitigation Measure **CUL-1** would ensure that the Proposed Project design would be consistent with Rehabilitation Standards.

Construction activities associated with the establishment of dedicated bus lanes would involve minimal ground disturbance and excavation. Excavation activities would primarily be limited to two to three feet below ground surface, within soils previously impacted during initial road and sidewalk construction. Relocation activities, such as trees, signs, parking meters and streetlights, may extend to a depth of 12 feet below ground surface, below the currently disturbed soils. The potential exists for previously undiscovered and undocumented archaeological resources to be encountered during construction activities. Therefore, without mitigation, the Proposed Project would result in a significant impact related to construction activities. Mitigation Measure **CUL-2** would mitigate inadvertent impacts to subsurface archaeological deposits during construction.

Geology and Soils

Operations. The Proposed Project is located in a geologically active region prone to earthquakes, liquefaction, seismically-induced slope failure, and landslides. Liquefaction is unlikely to happen in the Project Area due to the deep groundwater (50 feet bgs and deeper) and may only occur at isolated areas (i.e., within the Eagle Rock Valley, along the Project Route and route options). However, seismically-induced settlements (dry settlements) are a potential hazard due to mostly granular soil deposits, deep groundwater, and expected high peak ground acceleration in the Project Area. The Proposed Project with route options crosses earthquake-induced landslide hazard areas in Eagle Rock and western Pasadena. Slope failure could affect surface streets associated with the Proposed Project. Therefore, without mitigation, the Proposed Project would result in a significant impact related to operational activities. Mitigation Measure **GEO-1** would ensure that the Proposed Project is designed to limit potential impacts related to ground shaking, liquefaction, lateral spreading, and seismically-induced slope failure.

Noise

Construction. Construction would require the use of heavy equipment, pneumatic tools, generators, concrete pumps, and similar equipment. The predicted noise level from typical construction activities is 87 dBA $L_{\rm eq}$ at 50 feet, though adherence to local ordinance restrictions on powered equipment would likely reduce the cumulative noise level for this mix of equipment. When added to existing ambient noise levels along the corridor that range from 60.1 to 74.1 dBA $L_{\rm eq}$, construction activities could increase ambient noise levels by 10 dBA $L_{\rm eq}$ or more. This level of noise increase would likely exceed local significance thresholds within one or more jurisdictions along the BRT alignment. Therefore, without mitigation, the Proposed Project would result in a significant impact related to construction activities. Mitigation Measure NOI-1 includes noise monitoring and performance standards that ensure construction noise levels would not exceed the significance thresholds. If monitoring indicates an exceedance, noise levels would be mandated to be reduced through a variety of control measures.

Implementing bus service would require construction of stations along the service corridor that could generate groundborne vibration or elevate groundborne noise levels. These activities could include, but not be limited to, breaking concrete, trenching for utilities, erecting station improvements, and repaving surfaces. Equipment such as rollers, pavers, dozers, backhoes, rough terrain forklifts, and skid steer loaders could generate marginal groundborne vibration. Most equipment operating near buildings and structures would not exceed the FTA's recommended limit of 0.2 in/sec PPV for any non-engineered timber and masonry buildings within 25 feet of construction activity. However, any use of vibratory rollers or more impactful equipment could exceed this limit based on the mix of equipment used and the proximity and condition of any nearby structures. Therefore, without mitigation, the Proposed Project would result in a significant impact related to construction activities. Mitigation Measures NOI-2 and NOI-3 would reduce potential groundborne vibration impacts by requiring best management practices to ensure buildings and structures are not damaged and to limit annoyance during the construction of the Proposed Project.



Tribal Cultural Resources

Construction. The Kizh Nation, Fernandeno Tataviam, and Gabrieleno/Tongva San Gabriel Band of Mission Indians tribal representatives identified areas of high sensitivity within the Project Area. The Proposed Project is located within an urbanized area and has been subject to disruption by previous development. As a result of previous development activities, surficial archaeological resources and any above-ground tribal cultural resources that may have existed have likely been displaced or destroyed. There is, however, the possibility that ground-disturbing activities could impact previously undiscovered buried tribal cultural resources of historical significance. Therefore, without mitigation, the Proposed Project would result in a significant impact related to construction activities. Mitigation Measure CUL-2 would mitigate inadvertent impacts to potential historic Tribal Cultural Resources. It requires a Qualified Archeologist, meeting the Secretary of the Interior's Standards for professional archaeology, to be retained and remain on call during all ground-disturbing activities. Mitigation Measure CUL-2 also established a treatment plan following the discovery of resources.

6.3 PROJECT OBJECTIVES

Per the CEQA Guidelines, the achievement of project objectives should influence the selection of alternatives analyzed in a Draft EIR. Specifically, the "range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects." (CEQA Guidelines Section 15126.6(c)). The Proposed Project would provide improved and reliable transit service to meet the mobility needs of residents, employees, and visitors who travel within the corridor. In addition to advancing the goals of Metro's Vision 2028 Strategic Plan, objectives include:

- Advance a premium transit service that is more competitive with auto travel.
- Improve accessibility for disadvantaged communities.
- Improve transit access to major local and regional activity and employment centers.
- Enhance connectivity to Metro and other regional transit services.
- Provide improved passenger comfort and convenience.
- Support community plans and transit-oriented community goals.

6.4 ALTERNATIVES TO THE PROPOSED PROJECT

The CEQA statute, the CEQA Guidelines, and related court cases do not specify a precise number of alternatives to be evaluated in an EIR. Rather, "the range of alternatives required in an EIR is governed by the rule of reason that sets forth only those alternatives necessary to permit a reasoned choice." At the same time, CEQA Guidelines Section 15126.6(b) requires that "...the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project" and Section 15126.6(f) requires that "[t]he alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project." Accordingly, alternatives that



would not address potentially significant effects are not considered herein. However, the CEQA Guidelines require that a No Project alternative must be included in the EIR. Other alternatives may involve modifying project elements.

Alternatives should be selected on the basis of their ability to attain all or most of the basic objectives of the project, while reducing the project's potentially significant environmental effects. The CEQA Guidelines state that "...[t]he EIR should briefly describe the rationale for selecting alternatives to be discussed [and]...shall include sufficient information to allow meaningful evaluation, analysis and comparison with the proposed project." The feasibility of the alternatives is another consideration in the selection of alternatives. The CEQA Guidelines state that "[a]mong the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations [and] jurisdictional boundaries. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making." Alternatives that are considered remote or speculative, or whose effects cannot be reasonably predicted, do not require consideration. Therefore, feasibility, the potential to mitigate significant project-related impacts, and reasonably informing the decision-maker are the primary considerations in the selection and evaluation of alternatives.

The Proposed Project includes options for the BRT route. This was necessary due to public feedback during the completion of the Alternatives Analysis and EIR scoping feedback. It was not possible to reach a consensus on one route preferred by Metro, the cities, stakeholders, and general public. Metro determined that stakeholders and decision-makers would best be informed about the Proposed Project by equally evaluating the potential environmental impacts of multiple routes. Therefore, what would traditionally be assessed as new routes in this Alternatives chapter are included as part of the analysis of the Proposed Project. For a comparison of the Proposed Project and the route options, please refer to Executive Summary, Section ES.14, and Executive Summary, **Table ES-5**. The following analysis includes two alternatives, neither of which involves alternative routes. The two alternatives are a No Project and an Improved Bus Service Alternative.

Alternative 1 – No Project Alternative

The No Project Alternative is required by CEQA Guidelines Section 15126.6 (e)(2) and assumes that the Proposed Project would not be implemented by Metro. The No Project Alternative allows decision-makers to compare the impacts of approving the Proposed Project with the impacts of not approving the Proposed Project. The No Project Alternative is evaluated in the context of the existing transportation facilities in the Project Area and other capital transportation improvements and/or transit and highway operational enhancements that are reasonably foreseeable.

The No Project Alternative would include the North San Fernando Valley (SFV) BRT Project and the NextGen Bus Plan, in addition to other transportation and land use projects listed in Chapter 5 Cumulative Impact Analysis. The North SFV BRT Improvements Project is a proposed new



18-mile BRT line that is intended to serve the portions of the San Fernando Valley that are north of the Metro Orange G Line (Orange) service area. This project would provide a new, high-quality bus service between the communities of Chatsworth to the west and North Hollywood to the east. The Proposed Project connection to the Metro Orange G Line (Orange) would enhance existing bus service and increase transit system connectivity. The Joint Development - North Hollywood Station project would construct facilities at the North Hollywood B/G Line (Red/Orange) Station that would be shared by the Proposed Project, if it is approved. The project has been identified in the Measure M Expenditure Plan, with a projected opening date between FY 2023-25 and \$180 million of funding.

The NextGen Bus Study reimagines the bus network to be more relevant, reflective of, and attractive to the diverse customer needs within Los Angeles County. NextGen will realign Metro's bus network based upon data of existing ridership and adjust bus service routes and schedules to improve the overall network. The service plan is anticipated to begin implementation in 2021. With the implementation of NextGen, resources from Metro's Rapid bus service (existing 700 route series) are reinvested in consolidated local service operating on the same corridors. In this corridor, Metro Rapids 762, 780, and 794 will be replaced by reconstructed and more frequent service on Metro local Lines 260, 180, and 94, respectively. Reconfigured Metro 180 comes the closest to addressing the Proposed Project corridor, linking Pasadena, Eagle Rock and Glendale via Colorado Boulevard and Broadway, before continuing to Hollywood Boulevard and south on Fairfax Avenue to terminate at the La Cienega/Jefferson Station on the E (Expo) Line. In addition, an express Line 501 also would continue operation between North Hollywood, Burbank, Glendale, and Pasadena, with improved stops in downtown Glendale to be implemented as part of the NextGen improvements.

Alternative 2 – Improved Existing Bus Service Alternative

Alternative 2 would implement improved existing bus service instead of BRT. The bus line would be a local express service with some BRT characteristics. The service may be as frequent as that proposed for BRT, though its ability to attract as much ridership may be less due to less travel time savings and amenities, meaning a slightly less frequent service would be operated compared to that proposed for the BRT Project. The buses would operate in mixed-flow traffic with TSP systems. Stops would be more frequent than the BRT line but less frequent than local bus lines (typically every 0.6 miles on average). Travel times would be faster than for local service but slower than the travel times expected from the BRT Project. Stops would occur at existing bus stations and there would be no median-running, center-running, or side-running configuration. Physical improvements would be limited to new signs at bus stops as well a shelter with solar lighting, bench and trash receptacle as a minimum level of bus stop amenity. Alternative 2 would not include curb extensions, elimination of parking, or changes to bicycle lanes. Like the Proposed Project, this alternative would not require a Maintenance and Storage Facility, as buses would be maintained at existing Metro facilities. Similar to BRT buses, buses would have low-floor design to allow for faster and easier boarding and alighting. The fleet would be equipped for all door boarding.



6.5 ALTERNATIVES ANALYSIS

Under CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to allow meaningful evaluation, analysis, and comparison with the Proposed Project (including the route options). The alternatives analysis addresses the same environmental topics that were evaluated in Chapter 3 (i.e., aesthetics, air quality, biological resources, cultural resources, energy resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, land use and planning, noise and vibration, transportation, and tribal cultural resources). Potentially significant impacts and the mitigation measures proposed to reduce them to less-than-significant levels are described in Chapter 3, Environmental Impact Analysis. Environmental resources to which the Proposed Project would not have the potential to cause significant impacts or would have a less-than-significant impact with regulatory compliance are addressed in Section 4.1, Effects Determined Not to Be Significant. An alternatives analysis is not warranted for environmental resources to which the Proposed Project was determined to not have potential significant impacts. These include agriculture and forestry resources, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, recreation, utilities and service systems, and wildfire.

Analysis of No Project Alternative

Aesthetics

The No Project Alternative would not include physical changes to the existing Proposed Project route and route options that could affect aesthetics and views. This alternative would not result in permanent alterations to the street where bus lanes are proposed and along sidewalks and medians where station platforms are proposed. The No Project Alternative would not affect potential historic streetlights on Central Avenue and Broadway. In addition, this alternative would not introduce features that would obstruct or damage scenic resources such as trees, rock outcroppings, and historic buildings within a state scenic highway. The No Project Alternative would not include development that would impact scenic vistas and would not include a significant new source of substantial light or glare which would adversely affect daytime or nighttime views. The No Project Alternative would not result in a significant impact related to aesthetics. Impacts would be less than those of the Proposed Project, which were determined to be less-than-significant with mitigation measures.

Air Quality

The No Project Alternative includes the existing transportation network and land use developments that generate air pollutant emissions. Without the Proposed Project, mobile sources and land uses would continue to generate pollution. However, there is no specific action associated with the No Project Alternative that would cause an impact. There would be no potential to conflict or obstruct air quality plans, result in a cumulatively considerable net increase of a criteria pollutant, expose sensitive receptors to substantial pollutant concentrations, or result in other emissions such as odors that could adversely affect a substantial number of people. The No Project Alternative would not result in a significant impact



related to construction or operational activities. Construction impacts would be less than those of the Proposed Project, which were determined to be less than significant.

A consequence of the No Project Alternative would be that Metro would not be able to improve regional transit ridership. It is anticipated that improved bus service between North Hollywood and Pasadena would reduce regional vehicle miles traveled by making the Metro system a more desirable mode of transportation, thereby indirectly reducing passenger vehicle emissions. This benefit would not be realized under the No Project Alternative.

Biological Resources

The No Project Alternative would not include physical changes to the existing Proposed Project route and route options that could affect biological resources. This alternative would not result in the removal of trees from sidewalks or medians along the Proposed Project route or route options. The No Project Alternative would not impact terrestrial habitat, riparian habitat, or wetlands. This alternative would not impact candidate, sensitive, or special status species or impede the movement of wildlife. There would be no potential to conflict with policies or ordinances protecting biological resources or conflict with conservation plans. The No Project Alternative would not result in a significant impact related to biological resources. Impacts would be less than or equal to those of the Proposed Project, which were determined to be less than significant with mitigation for construction activities and no impact for operational activities.

Cultural Resources

The No Project Alternative would not include physical changes to the existing Proposed Project route and route options that could affect cultural resources. This alternative would not result in ground disturbance, acquisition, and/or modification of cultural resources along the Proposed Project route and route options. There would be no potential for construction or operational activities to disturb historic or archaeological resources. The No Project Alternative would not result in a significant impact related to cultural resources. This impact would be less than what was identified for the Proposed Project, which was determined to be less-than-significant with mitigation.

Energy

The No Project Alternative includes the existing transportation network and land use developments that consume transportation fuels, electricity, and natural gas. Without the Proposed Project, mobile sources and land uses would continue to use transportation fuels. However, there is no specific action associated with the No Project Alternative that would cause an impact. There would be no potential to create impacts related to fuel consumption or conflicts with renewable energy or energy efficiency plans. The No Project Alternative would not result in a significant impact related to construction or operational activities. Construction impacts would be less than those of the Proposed Project, which were determined to be less than significant for construction.



A consequence of the No Project Alternative would be that Metro would not be able to improve regional transit ridership. It is anticipated that improved bus service between North Hollywood and Pasadena would reduce regional vehicle miles traveled by making the Metro system a more desirable mode of transportation, thereby indirectly reducing transportation-related energy use. This benefit would not be realized under the No Project Alternative.

Geology and Soils

The No Project Alternative would not include physical changes to the existing Proposed Project route and route options that could affect geology and soils. This alternative would not result in ground disturbance, acquisition, and/or modification of geology and soils from construction or operations of the Proposed Project. There would be no potential for construction or operational activities to result in in impacts from seismic events, landslides, erosion, lateral spreading, subsidence, liquefaction, collapse, alternative wastewater systems, or paleontological resources. The No Project Alternative would not result in a significant impact related to geology and soils. This impact would be less than what was identified for the Proposed Project, which was determined to be less-than-significant for construction activities and less-than-significant with mitigation for operational activities.

Greenhouse Gas Emissions

The No Project Alternative includes the existing transportation network and land use developments that generate GHG emissions. Without the Proposed Project, mobile sources and land uses would continue to generate pollution. However, there is no specific action associated with the No Project Alternative that would cause an impact. There would be no potential to generate significant GHG emissions or conflict with GHG reduction plans. The No Project Alternative would not result in a significant impact related to construction or operational activities. Construction impacts would be or less than those of the Proposed Project, which were determined to not be significant.

A consequence of the No Project Alternative would be that Metro would not be able to improve regional transit ridership. It is anticipated that improved bus service between North Hollywood and Pasadena would reduce regional vehicle miles traveled by making the Metro system a more desirable mode of transportation, thereby indirectly reducing passenger vehicle emissions. This benefit would not be realized under the No Project Alternative. The No Project Alternative would have no potential to create impacts related to GHG emissions. Similar to the Proposed Project, there would be no potential for operational impacts.

Hazards and Hazardous Materials

The No Project Alternative would not include physical changes to the existing Proposed Project route and route options that could affect hazards and hazardous materials. This alternative would not result in impacts to hazardous materials, airports, emergency response plans, or wildland fires. The No Project Alternative would not result in a significant impact related to hazards and hazardous materials. This impact would be less than what was identified for the Proposed Project, which was determined to be less-than-significant with implementation of



mitigation measures. This impact would be less than what was identified for the Proposed Project, which was determined to be less than significant.

Land Use and Planning

The No Project Alternative would not include physical changes to the existing Proposed Project route and route options that could affect land use and planning. There would be no potential for construction activities to physically divide an established community or conflict with land use plans, policies, or regulations. Regarding long-term planning and land use, the No Build Alternative would not physically divide an established community. This alternative would not interfere with regional and local plans (e.g., SCAG 2020-2045 RTP/SCS), policies, or regulations of encouraging land use and growth patterns that facilitate transit and non-motorized transportation and focusing growth along major transportation corridors in the region, but as a consequence, would also do nothing to further those goals. This impact would be less than what was identified for the Proposed Project, which was determined to be less than significant.

Noise

The No Project Alternative would not include physical changes to the existing Proposed Project route and route options that could affect noise and vibration. There would be no construction activities and no new noise or vibration exposure associated with heavy-duty equipment or construction trucks. There would be no potential to increase ambient noise levels, generate excessive vibration, or expose people to excessive aircraft noise. Impacts would be less than those of the Proposed Project, which were determined to be less than significant with mitigation.

The No Project Alternative includes the existing transportation network and land use developments that generate operational noise. Without the Proposed Project, mobile sources and land uses would continue to generate operational noise. However, there is no specific action associated with the No Build Alternative that would cause an impact. Impacts would be less than those of the Proposed Project, which were determined to be less than significant.

Transportation

The No Project Alternative would not include physical changes to the existing Proposed Project route and route options that could affect the transportation system. There would be no construction activities and associated lane closures and/or traffic hazards. There would be no potential to conflict with programs, plans, ordinance, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. There would also be no potential for increased hazards due to design features or incompatible land uses or inadequate emergency access. The No Project Alternative would not result in a significant impact related to construction activities. Construction impacts would be less than those of the Proposed Project, which were determined to be less than significant with mitigation.

The No Project Alternative would not change existing operating conditions on local roadways. There would be no operational activities and transportation effects. There would be no potential to conflict with programs, plans, ordinance, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. There would also be no potential for



increased hazards due to design features or incompatible land uses or inadequate emergency access. Operational impacts would be less than those of the Proposed Project, which were determined to be less than significant with mitigation.

Tribal Cultural Resources

The No Project Alternative would not include physical changes to the existing Proposed Project route and route options that could affect tribal cultural resources. There would be no potential for construction or operational activities to disturb tribal cultural resources. The No Project Alternative would not result in a significant impact related to tribal cultural resources. Impacts would be less than or equal to those of the Proposed Project, which were determined to be less than significant with mitigation for construction activities and no impact for operational activities.

Analysis of Alternative 2

Aesthetics

Alternative 2 would operate entirely within the existing roadway ROW without significant physical improvements. This alternative would not affect existing medians or historic streetlights. Stops would occur at existing bus stations and there would be no median-running, centerrunning, or side-running configuration. New signs would be installed at stops to identify the Metro buses. These signs would be visually similar to existing Metro signs. Alternative 2 would not introduce features that would obstruct or damage scenic resources such as trees, rock outcroppings, and historic buildings within a state scenic highway. Alternative 2 would have no potential to create impacts to scenic vistas during construction or operations. This alternative would also have no potential to create a new source of substantial light or glare which would adversely affect day or nighttime views. Alternative 2 would not result in significant impacts related to construction or operational activities. Impacts would be less than those of the Proposed Project, which were determined to be less-than-significant with mitigation.

Air Quality

Alternative 2 would not include substantial construction activities. Minor construction may be needed to install information signs and benches. There would be no potential for Alternative 2 to generate significant construction emissions that would exceed SCAQMD significance thresholds. This alternative would not conflict or obstruct air quality plans, result in a cumulatively considerable net increase of a criteria pollutant, expose sensitive receptors to substantial pollutant concentrations, or result in other emissions such as odors that could adversely affect a substantial number of people. Similar to the Proposed Project, Alternative 2 would result in less-than-significant impacts related to construction activities. However, the quantity of construction emissions associated with Alternative 2 would be less than those of the Proposed Project.

Similar to the Proposed Project, Alternative 2 would use electric buses and would not generate direct emissions. Also similar to the Proposed Project, indirect emissions related to electricity use to charge bus batteries would not be significant. There would be no potential to conflict or obstruct air quality plans, result in a cumulatively considerable net increase of a criteria



pollutant, expose sensitive receptors to substantial pollutant concentrations, or result in other emissions such as odors that could adversely affect a substantial number of people. Similar to the Proposed Project, Alternative 2 would result in less-than-significant impacts related to operational activities. However, it is anticipated that Alternative 2 would result in less ridership than the Proposed Project, as the Proposed Project would have dedicated bus lanes, station amenities, and other features that will boost its attractiveness and reliability relative to the Alternative 2 services. As a result, this alternative would not reduce VMT and associated pollutant emissions as much as the Proposed Project.

Biological Resources

Alternative 2 would not include physical changes to the existing environment that could affect biological resources. This alternative would not result in the removal of trees from sidewalks or medians. There would be no change to the existing natural environment associated with construction or operational activities. Alternative 2 would not affect terrestrial habitats, riparian habitats, or wetlands. This alternative would not impact candidate, sensitive, or special status species or impede the movement of wildlife. There would be no potential to conflict with policies or ordinances protecting biological resources or conflict with conservation plans. Alternative 2 would not result in significant impacts related to construction activities. Construction impacts would be less than those of the Proposed Project, which were determined to be less-than-significant with mitigation. Similar to the Proposed Project, operational activities would not result in a significant impact.

Cultural Resources

Alternative 2 would not include physical changes to the existing environment that could affect cultural resources. This alternative would not require substantial ground disturbing activities. Minor digging near the surface may be required to install information signs and benches. There would be no potential for construction or operational activities to disturb archaeological resources or the potentially historic streetlights. Construction impacts would be less than those of the Proposed Project, which were determined to be less-than-significant with mitigation. Similar to the Proposed Project, operational activities would not result in a significant impact.

Energy

Alternative 2 would not include substantial construction activities. Minor construction may be needed to install information signs and benches. There would be no potential for Alternative 2 to use significant energy resources for construction activities. In addition, this alternative would not conflict with energy conservation plans. Similar to the Proposed Project, Alternative 2 would result in less-than-significant impacts related to construction activities. However, the quantity of construction-related energy use associated with Alternative 2 would be less than those of the Proposed Project.

Similar to the Proposed Project, Alternative 2 would use electric buses and would not generate direct emissions. Also similar to the Proposed Project, indirect emissions related to electricity use to charge bus batteries would not be significant. There would be no potential to conflict with



energy conservation plans. Similar to the Proposed Project, Alternative 2 would not result in a significant impact related to operational activities. However, it is anticipated that Alternative 2 would result in less ridership than the Proposed Project. As a result, this alternative would not reduce VMT and associated transportation energy use as much as the Proposed Project. Alternative 2 would result in less of a permanent energy benefit than the Proposed Project.

Geology and Soils

Alternative 2 would not include physical changes to the existing environment that could affect geology and soils. Minor construction may be needed to place information signs and benches. This alternative would not result in substantial ground disturbance, acquisition, and/or modification of geology and soils from construction or operational activities. There would be no potential for construction or operational activities to result in in impacts from seismic events, landslides, erosion, lateral spreading, subsidence, liquefaction, collapse, alternative wastewater systems, or paleontological resources. Alternative 2 would not result in a significant impact related to geology and soils. Construction impacts would be less than those of the Proposed Project, which were determined to be less-than-significant with mitigation. Similar to the Proposed Project, operational activities would not result in a significant impact.

Greenhouse Gas Emissions

Alternative 2 would not include substantial construction activities. Minor construction may be needed to install information signs and benches. There would be no potential for Alternative 2 to generate substantial construction emissions. Per SCAQMD guidance, GHG construction emissions are considered together with operational emissions to assess significance. Similar to the Proposed Project, Alternative 2 would use electric buses and would not generate direct emissions. Also similar to the Proposed Project, indirect emissions related to electricity use to charge bus batteries would not be significant. It is anticipated that Alternative 2 would increase ridership on the Metro system thereby reducing regional VMT. However, the VMT reduction would be less than that of the Proposed Project but would still result in a reduction of transportation-related energy use. As a result, Alternative 2 would not conflict with GHG reduction plans. Similar to the Proposed Project, Alternative 2 would not result in a significant impact related to construction or operational activities. However, Alternative 2 would result in less of a permanent GHG benefit than the Proposed Project.

Hazards and Hazardous Materials

Alternative 2 would not include physical changes to the existing environment that could affect hazards and hazardous materials. Minor construction may be needed to place information signs and benches. This alternative would not result in substantial ground disturbance, acquisition, and/or modification from construction or operational activities resulting in disturbance of hazardous sites. Alternative 2 would operate in the existing roadway ROW and there would be no change to existing emergency response plans. There would be no new hazardous situation related to airports or wildland fires. Alternative 2 would not result in a significant impact related to hazards and hazardous materials. Impacts would be less than those of the Proposed Project, which were determined to be less-than-significant.



Land Use and Planning

Alternative 2 would not include physical changes to the existing environment could affect land use and planning. There would be no potential for construction activities to physically divide an established community or conflict with land use plans, policies, or regulations. Regarding long-term planning and land use, Alternative 2 would not physically divide an established community. This alternative would not interfere with regional and local plans (e.g., SCAG 2020-2045 RTP/SCS), policies, or regulations of encouraging land use and growth patterns that facilitate transit and non-motorized transportation and focusing growth along major transportation corridors in the region but would also do less to further those goals than the Proposed Project because of reduced ridership. Alternative 2 would not result in a significant impact related to land use and planning. Impacts would be less than those of the Proposed Project, which were determined to be less-than-significant.

Noise

Alternative 2 would not include physical changes to the existing environment affecting noise or vibration. Minor construction may be needed to install information signs and benches. It is not anticipated that these activities would require equipment that would generate noise or vibration levels in excess of significance thresholds. Alternative 2 would result in a less-than-significant noise and vibration impact related to construction activities. Impacts would be less than those of the Proposed Project, which were determined to be less-than-significant with mitigation.

Alternative 2 would operate within the existing roadway and would not move travel lanes closer to land uses. Headways would be less than or equal to the Proposed Project. As a result, operational noise levels would be less than or equal to those estimated for the Proposed Project, which did not exceed significance thresholds. Similar to the Proposed Project, Alternative 2 would result in less-than-significant impacts related to operational activities.

Transportation

Alternative 2 would operate within the existing roadway and would not include physical changes to the existing transportation system. There would be no construction activities and associated lane closures and/or traffic hazards. There would be no potential for construction to conflict with programs, plans, ordinance, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. There would also be no potential for increased hazards due to design features or incompatible land uses or inadequate emergency access. Alternative 2 would not result in a significant construction impact related to transportation. Impacts would be less than those of the Proposed Project, which were determined to be less-than-significant with mitigation.

Alternative 2 would not change existing operating conditions on local roadways. There would be no operational activities and transportation effects. There would be no potential to conflict with programs, plans, ordinance, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. There would also be no potential for increased hazards due to design features or incompatible land uses or inadequate emergency access. It can reasonably be assumed that Alternative 2 would result in some decrease in regional VMT though the improvement would be less than the Proposed Project, as BRT service would be expected to attract more ridership than Alternative 2 services due to convenience and attractiveness associated



with frequent service, faster travel times, and more reliable travel times resulting from the BRT service operating in dedicated bus lanes along much of the route. Operational impacts would be less than those of the Proposed Project, which were determined to be less than significant.

Tribal Cultural Resources

Alternative 2 would not include physical changes to the existing environment that could affect tribal cultural resources. This alternative would not require substantial ground disturbing activities. Minor digging near the surface may be required to install information signs and benches. There would be no potential for construction or operational activities to disturb tribal cultural resources. Construction impacts would be less than those of the Proposed Project, which were determined to be less-than-significant with mitigation. Similar to the Proposed Project, operational activities would not result in a significant impact.

6.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines Section 15126.6 requires that an "environmentally superior" alternative be selected among the alternatives that are evaluated in the Draft EIR. The environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts. A summary of the impacts of the No Project Alternative (Alternative 1) and Alternative 2 relative to the Proposed Project and route options is shown **Table 6-1**.

The No Project Alternative is considered the environmentally superior alternative because there would be no physical changes to the existing environment resulting in construction or operational impacts. Other transit projects would be constructed to enhance the regional network, although improvements within the Project corridor would be limited and minor related to increased ridership. The No Project Alternative would include the North SFV BRT Project and the NextGen Bus Plan, in addition to other transportation and land use projects listed in Chapter 5 Cumulative Impact Analysis. The North SFV BRT Improvements Project would provide a new, high-quality bus service between the communities of Chatsworth to the west and North Hollywood to the east. Not constructing and operating the Proposed Project would eliminate the potentially significant impacts associated with the Proposed Project related to transportation (construction), aesthetics (operations), biological resources (construction), cultural resources (construction and operations), geology and soils (operations), noise (construction), and tribal cultural resources (construction). However, the regional transit network within the Project corridor would not be substantially enhanced by the other transit projects.

If the No Project Alternative is identified as the environmentally superior, CEQA requires selection of the environmentally superior alternative other than the No Project Alternative from among the Proposed Project and the other alternatives evaluated in the Draft EIR. Alternative 2 is the environmentally superior alternative because, as compared to the Proposed Project and route options, it avoids or reduces all construction impacts related to transportation, biological resources, cultural resources, noise, and tribal cultural resources. It also avoids or reduces operational impacts related to transportation, aesthetics, cultural resources, and geology and soils.



Table 6-1 – Comparison of Alternatives to the Proposed Project and Route Options

Proposed Project/Alternative			Environmental Resource									
	District Options		Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy Resources	Geology and Soils	GHG	Noise	Transportation	Tribal
Proposed Project and Route Options	North Hollywood	A1 (Proposed Project)	LTS	LTS	LTSM BIO-1	LTSM CUL-2	LTS	LTSM GEO-1	NI	LTSM NOI-1 NOI-2	LTSM TRA-1 TRA-2 TRA-3 TRA-4 TRA-6	LTSM CUL-2
		A2	LTS	LTS	LTSM BIO-1	LTSM CUL-2	LTS	LTSM GEO-1	NI	LTSM NOI-1 NOI-2	LTSM TRA-1 TRA-2 TRA-3 TRA-6	LTSM CUL-2
	Glendale	E1 (Proposed Project	LTSM CUL-1	LTS	LTSM BIO-1	LTSM CUL-1 CUL-2	LTS	LTSM GEO-1	NI	LTSM NOI-1 NOI-2	LTSM TRA-1 TRA-2 TRA-3 TRA-4 TRA-6	LTSM CUL-2
		E2	LTSM CUL-1	LTS	LTSM BIO-1	LTSM CUL-1 CUL-2	LTS	LTSM GEO-1	NI	LTSM NOI-1 NOI-2	LTSM TRA-1 TRA-2 TRA-3 TRA-4 TRA-6	LTSM CUL-2
		E3	NI	LTS	NI	NI	LTS	LTSM GEO-1	NI	LTS	LTSM TRA-1 TRA-2 TRA-3 TRA-6	NI



Proposed Project/Alternative			Environmental Resource									
	District	Options	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy Resources	Geology and Soils	GHG	Noise	Transportation	Tribal
Proposed Project and Route Options	Eagle Rock	F1	LTSM VIS-1 VIS-2	LTS	LTSM BIO-1	LTSM CUL-2	LTS	LTSM GEO-1	NI	LTSM NOI-1 NOI-2	LTSM TRA-1 TRA-2 TRA-3 TRA-4 TRA-5 TRA-6	LTSM CUL-2
		F2 (Proposed Project	LTS	LTS	LTSM BIO-1	LTSM CUL-2	LTS	LTSM GEO-1	NI	LTSM NOI-1 NOI-2	LTSM TRA-1 TRA-2 TRA-3 TRA-4 TRA-6	LTSM CUL-2
		F3	LTS	LTS	NI	LTSM CUL-2	LTS	LTSM GEO-1	NI	LTS	LTSM TRA-1 TRA-2 TRA-3 TRA-6	LTSM CUL-2
	Pasadena	G1 (Proposed Project	LTS	LTS	LTSM BIO-1	LTSM CUL-2	LTS	LTSM GEO-1	NI	LTSM NOI-1 NOI-2	LTSM TRA-1 TRA-2 TRA-3 TRA-6	LTSM CUL-2
		G2	LTS	LTS	LTSM BIO-1	LTSM CUL-2	LTS	LTSM GEO-1	NI	LTSM NOI-1 NOI-2	LTSM TRA-1 TRA-2 TRA-3 TRA-6	LTSM CUL-2



Proposed Project/Alternative			Environmental Resource									
	District	Options	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy Resources	Geology and Soils	GHG	Noise	Transportation	Tribal
Proposed Project and Route Options	Pasadena	H1 (Proposed Project)	LTS	LTS	LTSM BIO-1	LTSM CUL-2	LTS	LTSM GEO-1	NI	LTSM NOI-1 NOI-2	LTSM TRA-1 TRA-2 TRA-3 TRA-6	LTSM CUL-2
		H2	LTS	LTS	LTSM BIO-1	LTSM CUL-2	LTS	LTSM GEO-1	NI	LTSM NOI-1 NOI-2	LTSM TRA-1 TRA-2 TRA-3 TRA-6	LTSM CUL-2
	No Project Alternative		NI	NI	NI	NI	NI	NI	NI	NI	NI	NI
Alternative 2		NI	LTS	LTS	LTS	LTS	NI	NI	LTS	LTS	NI	

Note: NI= No Impact, LTS = Less Than Significant, LTSM = Less Than Significant with Mitigation

SOURCE: Terry A. Hayes Associates Inc., 2020.

