6. ALTERNATIVES

Pursuant to Section 15060, a preliminary review of the proposed project was conducted and it was determined that the appropriate level of environmental review involved the preparation of an EIR. During the course of preparing this Draft EIR, it was determined that the proposed project would have no significant effects with the implementation of mitigation measures. Although the proposed project meets the criteria for the preparation of a Mitigated Negative Declaration (Section 15070), Metro decided to continue preparing the Draft EIR to facilitate greater public participation during the environmental review process. CEQA requires an analysis of alternatives to the proposed project to reduce or eliminate significant impacts associated with project development. Alternatives were considered that would avoid or reduce potential impacts of the proposed project to a less than significant level. The following analysis is provided to inform the public and decision-makers of potential impacts of alternatives as compared to the proposed project.

6.1. AVOIDANCE ALTERNATIVES

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.

6.1.1. Project Impacts

This Draft EIR evaluates each of the environmental topics that are enumerated in the CEQA's Environmental Checklist Form (Appendix G). Chapter 3, Environmental Impacts includes a detailed analysis of environmental topics where the proposed project would result in a less-than-significant impact or a less-than-significant impact with incorporation of mitigation. Environmental topics where 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 4.4, Effects Determined Not to Be Significant. The analysis of alternatives provided below addresses the same environmental topics that were evaluated in Chapter 3: Air Quality, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Land Use and Planning, Noise and Vibration and Transportation and Traffic. Further discussion is not warranted for environmental issue areas that were determined to have no potential for significant impacts. The only impact that would result in a significant impact without mitigation is Hazards and Hazardous Materials. See Chapter 3 for a more detailed discussion.



6.1.2. Alternative Project Sites Considered

As indicated previously, mitigations measures are required to reduce the proposed project's hazardous materials impact to a less-than-significant level. To avoid or substantially reduce this impact would require the relocation of the proposed project to an alternate site where there would be no or substantially reduced contamination and remediation requirements. While the proposed project's hazardous materials impact would be less than significant with mitigation; this analysis is provided to address alternate sites and avoid hazardous materials impacts without requiring mitigation or create a new impact that would not occur if the proposed project were built. In addition, the proposed project requires approximately 4.5 acres to accommodate the bus facility. As discussed below, there are no viable alternate sites to provide a feasible alternate location for the proposed project.

To achieve one of the primary objectives of the proposed project, a key consideration is whether the alternate site has direct access to the regional rail system, specifically via the Crenshaw/LAX Line and the proposed extension of the Metro Green Line, as well as satisfy additional objectives of providing an efficient connection for buses to reach the airport area and provide shuttle access into the CTA. Under these circumstances, an alternate site would of necessity have to be within the LAX vicinity and be accessible to patrons transferring from rail to/from bus or airport shuttles. Specifically, an alternate site would have to be adjacent to the Metro ROW. The only location that meets this criterion is the area between Hindry Avenue on the north and Imperial Highway on the south along the Metro ROW. Within this area, the segment between Century Boulevard and Imperial Highway is not available because this area is within LAX property and is directly in the landing and takeoff paths of aircraft. As such, this area is within the designated RPZ, which would prohibit the development of a site for a transportation center. Further north in the segment between Century Boulevard and Arbor Vitae Street, there are no siting opportunities besides the No Project Alternative site at Aviation and Century Boulevards and the project site at 96th Street and Aviation Boulevard. Also within this segment there are significant development constraints on the east side of the Metro ROW. East of the Metro ROW there is multi-level airport parking structure (Wally Park) in the southwest portion, which is too small for the proposed project, and Metro is constructing a light rail maintenance facility in the northwest portion.

Alternate sites are thus largely limited to the segments along the Metro ROW between Arbor Vitae Street and Hindry Avenue in the City of Inglewood. In this segment there are no undeveloped sites that would entirely satisfy the bus bay capacity requirements of the proposed project. Development on any of the sites, therefore, would require the removal of existing structures. Additionally, parcels south of Florence Avenue, north of Manchester Avenue, east of Aviation Boulevard and west of Hindry Avenue were eliminated due to Florence Avenue separating these sites from the Metro ROW.

Alternate Sites A through H, as show in Figure 6.1, have been selected for evaluation based primarily on satisfying one or more of the proposed project's objectives, adjacency to the Crenshaw/LAX Line, proximity to LAX and whether the size of the site could accommodate most of the major components of the proposed project. The parcel between Sites G and H is



occupied by a power substation and was not considered in this analysis due to potential hazardous materials on the site related to transformers and the additional electrical impacts posed by relocating such a facility. Table 6.1 describes the size, distance to LAX, land uses and constraints for the alternate sites. The property west of the Metro ROW (Site A) cannot be considered because it is occupied by Merle Norman Cosmetics building, which has been determined eligible for the National Register of Historic Places. East of the Metro ROW is another rental car facility storage lot and service area (Site B) that, according to available records has similar contamination problems as the proposed project site. North of the rental car facility is Spartan College of Aeronautics and Technology (Site D). North of this location the accessibility of the Crenshaw/LAX Line is severely limited by the horizontal and vertical curve of the light rail alignment as well as the grade separated structure being constructed over Manchester Avenue.

The project area is largely occupied by a mix of industrial uses and some level of contamination has been identified at all of the subject sites except for sites C and F. Hazardous materials cases have been closed on sites A, D, E, and G. Sites B and H contain one or more open cases (active hazardous materials sites). Sites that are reported to have active or open hazardous materials cases are assumed to have impacts similar to or greater than those of the proposed project and it is reasonable to assume that mitigation would also be required at such locations. Since development at such sites would not reduce or avoid a potential hazardous materials impact, they are not considered feasible alternate project locations. Though development at Alternate Sites A, C, D, E, F and G may lessen or avoid hazardous materials impacts as discussed in Table 6.1, there are other potential environmental impacts and/or engineering constraints associated with each location. With the exception of Site D, such constraints render these sites infeasible locations for the proposed project. Initial review indicates that Site D would not have significant environmental impacts and/or engineering constraints. Site D would displace Spartan College of Aeronautics and Technology, which is a community-serving college. In addition, Site D would not meet one of the proposed project's primary objectives, which is to integrate the proposed project with existing and future transit connections and LAX facilities. Specifically, Chapter 5, Cumulative Impacts, of this Draft EIR describes transportation improvements that would occur under the LAMP and are forecast to be constructed and completed within the same timeframe as the proposed project (2035). The primary component of the LAMP as it relates to the proposed project would be the APM system. Developing the proposed project at Site D would not allow the APM connection. Thus, taken together, none of the Alternate Sites would fully meet the objectives of the proposed project and are not considered further.



W 83RD ST SITE H SITE G W MANCHESTER AVE SITEE SITE F SITE C SITE D SITE B SITEA W ARBOR VITAE ST **LEGEND** Approximate Scale Alternate Site Westchester/Veterans Station

Figure 6.1 Alternate Site Locations

Source: Terry A. Hayes Associates Inc., 2016.



Table 6.1 Alternate Site Feasibility

| Site | Acres | Approx. Mileage to LAX | Land Use Type | Case Status ¹ | Alternate Site Constraints | |
|-----------------------------|-------|------------------------------|---|-----------------------------|--|--|
| Proposed Project Site | 9.53 | 1.5 | Light Industrial | Open | No constraints to fulfilling the proposed project objectives are present. Requires hazardous materials mitigation. | |
| A | 5.64 | 1.4 | Light Industrial | Closed | Merle Norman Cosmetics is a National Register Eligible Property. Of note, there would be a high employee displacement ratio per acre. ³ | |
| В | 8.27 | 1.6 | Light Industrial | Open | Contains multiple hazardous material sites. ² Contamination at this site is greater than at the project site, which precludes it from consideration as an alternate site. | |
| С | 14.8 | 1.7 | Light Industrial | Closed | As Bellanca Ave. is a two-lane road without a turn lane, buses traveling south from Manchester Ave. would block through-traffic while accessing or waiting to access the site. | |
| D | 7.63 | 1.8 | Light Industrial/ Institutional | Closed | Development of the site would displace an aviation-related technical education facility and 300-350 students. ² | |
| E | 6.52 | 1.9 | Light Industrial | Closed | No new rail station access would be possible because of the curvature of the rail alignment along this site. Bus access from Manchester Ave. would require westbound buses to turn left onto the site at the unsignalized intersections at Portal Ave. or at Bellanca Ave., which have an average useable width of less than 35 feet. As Bellanca Ave. is a two-lane road without a turn lane, buses traveling south from Manchester Ave. would block through-traffic while accessing or waiting to access the site. | |
| F | 6.87 | 2 | Light Industrial | Closed | No new rail station access would be possible because of the curvature of the rail alignment along this site. Bus access would be limited to ingress and egress from Aviation Blvd. The distance to LAX is 2 miles. | |
| G | 12.2 | 2.1 | Light Industrial/Public Utilities | Closed | The site is occupied by the County's Road Maintenance District Office and a Flood Control District right-of-way inclusive of a well (Map No. 2-RW3). Residences are located along 83 rd St. across from the site. Additionally, the site is located in a methane hazard zone. The distance to LAX is greater than 2 miles. | |
| Н | 5.15 | 2.3 | Light Industrial | Open | Due to the La Cienega/I-405 bridge structure, Green Line turn around tail relocation would not be possible. This location contains an active hazardous materials site. ² Additionally, the site is located in a methane hazard buffer zone. Residences are located along 83 rd St. across from the site. The distance to LAX is greater than 2 miles. | |

¹Envirostor Database, http://www.envirostor.dtsc.ca.gov/.

Source: Terry A. Hayes Associates Inc., 2016.



²Telephone correspondence with Spartan College of Aeronautics and Technology Admissions Department.

³ Employment estimated from US Census 2014 block data. Rounded to nearest 100.

6.2. No Project Alternative

Section 15126.6(e) of the CEQA Guidelines states:

The specific alternative of "no project" shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.

The No Project Alternative would not include development related to the proposed project. The proposed project site would continue to be occupied by the existing rental car facilities, CNG fueling station and towing storage yard. The site would continue to be characterized by low-rise industrial structures (totaling approximately 19,000 square feet) and paved surfaces. The Crenshaw/LAX Line tracks will continue to be located on the western boundary of the proposed project site. The environmental impacts under the No Project Alternative are the same as under the Future Without Project scenario presented in the Air Quality, Greenhouse Gas, and Transportation and Traffic sections in Chapter 3 of this Draft EIR.

The No Project Alternative would include a number of differences from the existing conditions analysis. Specifically, the Crenshaw/LAX Line is scheduled for completion in 2019 and will be operating with or without development of the proposed project. Also, it is reasonably foreseeable that the No Project Alternative would include the development of a bus facility at the Aviation/Century station to provide better connectivity between bus and rail transit services. The Crenshaw/LAX Line, including the Aviation/Century station, the extension of Metro's Green Line and a proposed bus facility, were studied in the Crenshaw/LAX Transit Corridor Project EIS/EIR, which was certified by the Metro Board in September 2011 and issued a Record of Decision from the Federal Transit Administration in December 2011. Therefore, impacts of the proposed bus facility at the Aviation/Century station are not included in this assessment. The Aviation/Century station site plan is shown in Figure 6-2. The bus facility at Aviation/Century station would not be built if the proposed project is built. Most importantly, the Aviation/Century station would not provide a convenient connection to other future airport development projects such as the APM discussed in the cumulative impacts chapter of this report.

Table 6.2 presents a summary of the No Project Alternative impacts relative to the proposed project. The No Project Alternative would primarily have similar or less environmental impacts than the proposed project.

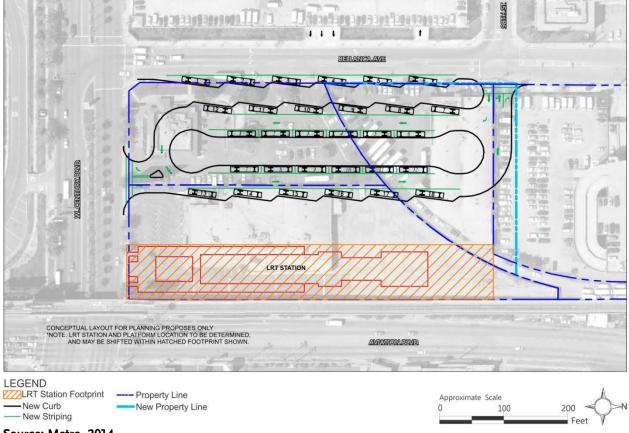


Figure 6.2 Aviation/Century Station Layout

Source: Metro, 2014.

Table 6.2 Comparison of the No Project Alternative to the Proposed Project

| | Proposed Project | No Project Alternative | Proposed Project v. No | | | | | | | |
|---|---------------------------------------|------------------------|---------------------------------|--|--|--|--|--|--|--|
| Environmental Issue | Impact | Impact | Project Alternative Impacts | | | | | | | |
| Air Quality (Construction) | Less Than Significant With Mitigation | No Impact | Less than the Proposed Project | | | | | | | |
| Air Quality (Operations) | Less Than Significant | Less Than Significant | Similar to the Proposed Project | | | | | | | |
| Greenhouse Gas Emissions (Construction) | Less Than Significant | No Impact | Less than the Proposed Project | | | | | | | |
| Greenhouse Gas Emissions (Operations) | Less Than Significant | Less Than Significant | Similar to the Proposed Project | | | | | | | |
| Hazards and Hazardous Materials | Less Than Significant With Mitigation | No Impact | Less than the Proposed Project | | | | | | | |
| Land Use and Planning | Less Than Significant | Less Than Significant | Similar to the Proposed Project | | | | | | | |
| Noise and Vibration (Construction) | Less Than Significant | No Impact | Less than the Proposed Project | | | | | | | |
| Noise and Vibration (Operations) | Less Than Significant | Less Than Significant | Slightly Greater | | | | | | | |
| Transportation and Traffic (Construction) | Less Than Significant | Less Than Significant | Similar to the Proposed Project | | | | | | | |
| Transportation and Traffic (Operations) | Less Than Significant | No Impact | Similar to the Proposed Project | | | | | | | |

Source: Terry A. Hayes Associates Inc., 2016.



6.2.1. Air Quality

This section addresses emissions of air pollutants that would result from construction and operation of the No Project Alternative. Refer to Section 3.1 Air Quality for a detailed discussion of the impacts of the Future Without Project condition (No Project Alternative). Construction activity associated with the implementation of the Crenshaw/LAX Line and associated facilities was previously analyzed in the Crenshaw/LAX Transit Corridor Project EIS/EIR. This alternative would not involve construction activity on the project site as there would be no change to the existing conditions. Therefore, there would be no emission of air pollutants generated by construction activities under the No Project Alternative.

Emissions of air pollutants associated with long-term operations under the No Project Alternative would be attributed to on-site buildings utility demand and waste disposal, as well as off-site VMT. The emissions from the stationary sources on the project site are considered indirect, as the supply of utilities and disposal of waste represent sources of emissions affiliated with other unrelated entities. The emissions from vehicular sources are considered direct as the change in VMT is correlated with alterations to local and regional transit system. Refer to Section 3.1 Air Quality for a detailed discussion of the methodology used to assess emissions, including VMT shown in Table 3.1.6. As discussed in Section 3.1 Air Quality, CalEEMod was used to estimate stationary source emissions, and mobile source emissions were quantified based on vehicular emissions factors contained within the CARB EMFAC2014 database.

The transportation data suggest that the No Project Alternative would result in a total of 559,616,634 daily VMT compared to 559,621,069 daily VMT for the proposed project; or a decrease of 4,435 daily VMT under the No Project Alternative relative to the proposed project. The lower daily VMT under the No Project Alternative is attributed to a different endpoint for the bus routes in the LAX area, additional total public transit trips, fewer VMT by air passengers and LAX employees and the lack of the pick-up and drop-off area.

Table 3.1.8 in Section 3.1, Air Quality shows the daily operational emissions for the No Project Alternatives, or Future Without Project conditions. When compared to the proposed project, the No Project Alternative would result in a minor decrease in daily emissions of all pollutants for which the SCAQMD has established maximum daily operational thresholds. The change in emissions for all pollutants under the No Project Alternative would be well below one percent.

Similar to the proposed project, unpleasant odors from existing facilities on the project site are subject to adherence to SCAQMD Rule 402 (Nuisance), which prevents nuisance odor conditions. As a result, the No Project Alternative would have a minor, if any, impact with respect to odors.

The No Project Alternative would result no impacts, as the existing uses on the project site would continue to function as they currently do, and would generate slightly fewer emissions



than the proposed project due to a lack of construction and minor changes in circulation patterns, transit ridership and on-site stationary sources.

6.2.2. Greenhouse Gas Emissions

This section addresses GHG emissions that would result from construction and operation of the No Project Alternative. Construction activity associated with the implementation of the Crenshaw/LAX Line and the Aviation/Century station is was previously analyzed in the Crenshaw/LAX Transit Corridor Project EIS/EIR. This alternative would not involve construction activity on the project site as there would be no change to the existing conditions. Therefore, there would be no GHG emissions generated by construction activities under the No Project Alternative.

Long-term operations under the No Project Alternative would generate GHG emissions from on-site building utility demand, waste disposal and VMT. Refer to the air quality discussion, above, for a description of utility use and VMT for the No Project Alternative. Refer to Section 3.2, Greenhouse Gas Emissions for a detailed discussion of the methodology used to assess emissions for all conditions, including future without project. Table 3.2.4 in Section 3.2 Greenhouse Gases shows that the No Project Alternative (Future Without Project Condition) would result in approximately 38,517,057 MTCO2e per year. Stationary sources, public transit and passenger vehicle emissions under the proposed project would generate 38,553,584 MTCO2e per year. The magnitude of annual GHG emissions under the No Project Alternative would be 36,527 MTCO2e per year less than the proposed project. This represents less than a one percent change in emissions.

This emissions analysis addresses the incremental difference between the proposed project and the No Project Alternative with the Aviation/Century station. Both the No Project Alternative and the proposed project incorporates the Crenshaw/LAX Line and the Aviation/Century station, which have not been included in this emissions analysis as they were analyzed in the Crenshaw/LAX Transit Corridor Project EIS/EIR. These components would connect LAX to Metro's regional rail system, which, as discussed in Section 3.2, Greenhouse Gas Emissions, would be consistent with the goals in Metro's Countywide Sustainability Planning Program and the 2016-2040 RTP/SCS. Similar to the proposed project, the No Project Alternative would result in a less-than-significant impact related to GHG Emissions. However, under the No Project Alternative, Metro transit would not be as well integrated with the future airport facilities, such as the APM included in the LAMP. The No Project Alternative would be less consistent with regional GHG reduction plans and goals than the proposed project.

6.2.3. Hazards and Hazardous Materials

The existing groundwater monitoring wells located on the project site, which are under the authority of the RWQCB and monitored by the responsible party (Honeywell International Inc.), would continue to be used to monitor groundwater VOC concentrations and migration resulting from residual contamination caused by the former Honeywell facility. As there



would be no construction on the site, there would be no potential for impacts related to the disturbance and transport of contaminated soils or health risk associated with relocating the SoCal Gas natural gas lines. The proposed project has the added benefit of removing contaminated soil, which would assist in cleaning up the project site. It should also be noted that no site contamination issues were identified for the Aviation/Century station in the Crenshaw/LAX Transit Corridor Project EIS/EIR. Thus, the No Project Alternative would result in no hazard or hazardous materials impacts. Although impacts of the proposed project were also determined to be less than significant, impacts associated with the No Project Alternative would be less than those of the proposed project as there are no additional site remediation requirements at the Aviation/Century station.

The Aviation/Century station is not located within the RPZ (refer to Chapter 3, Figure 3.3.2), would not be subject to FAA height limits, and would not require the use of airplane warning lights on top of the No Project Alternative's bus facility. Similar to the proposed project, the No Project Alternative would result in a less-than-significant impact related to airport hazards.

The No Project Alternative would not require the permanent closure of designated public or private emergency access routes that would impede emergency vehicle access to the project area. Similar to the proposed project, the No Project Alternative would result in a less-than-significant impact related to emergency access.

6.2.4. Land Use and Planning

Similar to the proposed project, the No Project Alternative would not change the existing zoning or land use designation at the project site. The project site is currently zoned as M1-1 Limited Industrial and designated as Limited Manufacturing by the General Plan. As there would be no changes to the existing use at the project site, the No Project Alternative would not create a new impact related to physically dividing an established community, conflicting with land use plans or conflicting with habitat/natural community conservation plans. As with the proposed project, land use and planning impacts would be less than significant for the No Project Alternative. However, it is importation to inform stakeholders that the No Project Alternative would not integrate the Metro transit system with the future APM and airport facilities included in the LAMP. This would be less consistent with regional land use and transit plans that promote regional connectivity, including the 2016-2040 RTP/SCS.

Under the No Project Alternative, no new development would occur on the project site. Consistent with the existing development, the project site is designated for industrial uses. The project proposes to develop the site with a transit facility that is also consistent with this land use designation and impacts were determined to be less than significant.

Though the existing development supports transportation-related industry and employment, the structures occupy a relatively small portion of the project site and remainder is used for outdoor storage, surface parking and circulation. While the No Project Alternative does meets the local and regional land use goals, policies and objectives applicable to the project site, the proposed project represents a transportation investment in public transit that better meets



the land use and transit goals on a broader scale and to a greater extent than the No Project Alternative.

Neither the proposed project site nor the Aviation/Century station are identified as critical habitat for threatened or endangered species and does not contain any candidate, sensitive or special status species. As such, neither the No Project Alternative nor the proposed project would conflict with any habitat conservation plan or natural community conservation plan. Therefore, the No Project Alternative would result in a less than significant land use impact and similar impacts as the proposed project.

6.2.5. Noise and Vibration

The No Project Alternative has been assessed for construction and operational emissions. Demolition and construction activities associated with the Crenshaw/LAX Line and associated facilities is on-going and was previously analyzed in the Crenshaw/LAX Transit Corridor Project EIS/EIR, and were determined to be mitigated to a less than significant level. This alternative would not include construction activity on the project site as there would be no change to the existing conditions. Thus, construction of the Aviation/Century station is not considered in the assessment of the No Project Alternative.

Regarding operations, the existing noise and vibration setting would be affected by the operation of the Crenshaw/LAX and Green Lines and the Aviation/Century station. Existing noise levels in Manchester Square and the Travelodge Hotel LAX would increase due to the rerouting of buses from Lot C to the Aviation/Century station and rail pass-by noise. The Aviation/Century station site does not include sensitive receptors. The effects of these facilities on sensitive receptors was studied in the Crenshaw/LAX Transit Corridor Project EIR/EIS, which did not identify significant operational noise or vibration impacts near the project site. The analysis has been updated with current information developed for this EIR, including regional growth to Future Without Project conditions and changes in bus volumes on Aviation Boulevard. As shown in Table 6.3, the No Project Alternative would increase noise levels by one decibel or less at sensitive receivers, and noise levels would not exceed the significance thresholds for moderate or severe impacts. Therefore, similar to the proposed project, the No Project Alternative would result in a less-than-significant impact related to operational noise.

Table 6.3 No Project Alternative Daytime/Nighttime Noise Levels and Impacts

| Noise Receiver | Existing Ldn | Total Noise Exposure | No Project | - | ct Criteria (dBA) ble 3.5.1) | No Project | Proposed Project |
|-------------------|-----------------|-------------------------|------------|----------|---------------------------------|------------|---------------------|
| (Figure 3.5.6) | (dBA) | Ldn (dBA) | Ldn (dBA) | Moderate | Severe | Impact? | Impact? |
| 1 | 70 | 70 | 56 | 64 | 69 | None | None |
| 2 | 70 | 70 | 57 | 64 | 69 | None | None |
| 3 | 70 | 70 | 58 | 64 | 69 | None | None |
| 4 | 71 | 71 | 60 | 65 | 70 | None | None |

Source: FTA, 2006; Terry A. Hayes Associates Inc., 2016.



Regarding vibration from the light rail transit system, the Crenshaw/LAX Transit Corridor Project EIR/EIS included a detailed vibration analysis associated with trains passing the project site at 35 miles per hour. No vibration impacts were identified near the project site. Regarding vibration from buses, the FTA has stated that the rubber tires and suspension systems of buses provide vibration isolation, making it unusual for buses to cause ground-borne noise or vibration problems. Similar to the proposed project, the No Project Alternative would result in a less-than-significant impact related to operational vibration.

6.2.6. Transportation and Traffic

The assessment of traffic conditions under the No Project Alternative focuses on potential intersection impacts in the project area without changes to the project site. The assessment of the No Project Alternative included the relocation of the Lot C bus facility (LAX City bus center) to the Aviation/Century station. Refer to Section 3.6 Transportation and Traffic for a detailed discussion of the methodology used in the transportation and traffic analyses.

Table 3.6.7 in Section 3.6 Transportation and Traffic shows intersection LOS under the No Project Alternative, or Future Without Project condition. For the AM peak hour, the analysis indicates that 23 of 24 intersections would operate at the same LOS. The Sepulveda/Century Boulevard intersection would operate at an LOS D under the No Project Alternative and an LOS E under the proposed project. For the PM peak hour, the analysis indicates that 24 of 24 intersections would operate at the same LOS.

Development in the No Project Alternative would utilize the existing and planned network of regional and local streets in the study area. In the absence of new development at the proposed project site, the No Project Alternative would not create new demand for fire or police services.

The project site would not be developed with pedestrian and bicycle amenities to enhance transit connectivity. However, the Aviation/Century station and area would include similar pedestrian and bicycle facilities and streetscapes. These improvements would be the result of on-going grant planning and coordination between Metro and the City of Los Angeles. Similar to the proposed project, the No Project Alternative would result in a less-than-significant impact related to pedestrian and bicycle facilities.

The rerouting of buses would have a minimal reduction in direct access for passengers presently riding to destinations other than transfers to the Metro rail system that are between 96th Street and Century Boulevard, depending on the bus line and the scope of rerouting. However, for most bus lines the rerouting would substantially increase connectivity and access to the rail system. The truncation of 10 routes results in a shorter overall run time for each line and is not anticipated to change vehicle requirements or substantially affect operations otherwise. For the three routes being lengthened, the additional service miles are generally minimal; two routes are extended approximately a half mile and the third is extended just over one mile. These extensions would expand the run time only a small amount. The Aviation/Century station would have the capacity to accommodate both the existing and future



passengers presently using the LAX City bus center and the Aviation/LAX transit center. The Aviation/Century station would be capable of handling the consolidated bus service with room for expanded frequency or additional lines in the future. While the No Project Alternative would provide a regional transit connection to LAX through the Aviation/Century station, it would not be integrated with future transit connections and airport facilities included in the LAMP.

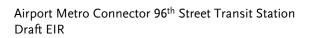
6.3. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines Section 15126.6 requires that an "environmentally superior" alternative be selected among the alternatives that are evaluated in the EIR. As described above, the proposed project would result in a less-than-significant impact with implementation of mitigation for hazards and hazardous waste. For all other environmental topics, the proposed project would result in a less-than-significant impact or no impact. However, the No Project Alternative would be the environmentally superior alternative as it would not change existing conditions at the project site (e.g., no requirement for the excavation and transport of contaminated soils), nor would there be additional or more severe undisclosed impacts at the Aviation/Century station which has previously been evaluated in the Crenshaw/LAX Transit Corridor Project EIS/EIR.

The degree to which an alternative meets the objectives of a proposed project is discussed as part of an alternatives analysis pursuant to CEQA. The proposed project consists of series of significant transportation elements and associated infrastructure components, including the LRT platforms, to be served by the Crenshaw/LAX Line and an extension of the Metro Green Line, a bus plaza and terminal facility for Metro and municipal bus operators, bicycle hub with secured parking for up to 150 bicycles, pedestrian plaza, passenger vehicle pick-up and drop-off area and Metro transit center/terminal building ("Metro hub") that connects passengers between the various modes of transportation. These project components are intended to provide a reliable and convenient transit option to and from LAX and the regional transit system. The stated objectives of the proposed project are to provide a reliable, fast and convenient connection for passengers traveling between the LAX area and the regional bus and rail transit system; integrate with existing and future transit connections and airport facilities; and increase the share of transit trips to and from LAX with minimal impact to airport facilities and surrounding communities and to help reduce air pollution.

While the No Project Alternative would provide a regional transit connection to LAX through the Aviation/Century station, it would not be integrated with the future APM and airport facilities included in the LAMP, as discussed in Chapter 5 Cumulative Impacts. Locating the bus facility at the Aviation/Century station would require patrons to walk to the proposed APM adjacent to the project site. This could require additional pedestrian and bicycle facilities along Aviation Boulevard. The project site was selected because of its strategic location and ability to link to existing and foreseeable transit projects. Therefore, despite being the environmentally superior to the proposed project, the No Project Alternative would not fully satisfy the project objectives.





This page intentionally left blank

