

## 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 site.

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 create significant and unavoidable impacts on the following environmental issue areas:

- **Cultural Resources (Historic Properties):** The Proposed Project would demolish the National Cold Storage facility and modify the Citizens Warehouse/Lysle Storage Company building and the 1<sup>st</sup> Street Bridge. Both of these buildings are historic properties. Mitigation measures are proposed to address this impact; however, no feasible mitigation measures were identified to reduce the significant impact to a less-than-significant level.
- **Noise and Vibration (Construction):** Noise and vibration generated by construction of the Proposed Project would result in significant impacts to OSF. Mitigation measures are proposed to address this impact. However, no feasible mitigation measures were identified to reduce the significant impact to a less-than-significant level because heavy-duty equipment would be needed for demolition and construction activities within five feet of OSF.

As also described in this Draft EIR, 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:

- **Aesthetics (Construction and Operations):** During construction, if construction-related illumination is not aimed at and positioned close to the area to be illuminated, the increased levels of ambient light due to construction-related lighting could potentially disturb residents at OSF. Implementation of Mitigation Measure **AES-1** would reduce this impact to less than significant. During operations, backlight and uplight from new nearby lighting fixtures could potentially disturb residents at OSF and any other future light-sensitive uses that may occupy the Citizens Warehouse/Lysle Storage Company building. Implementation of Mitigation Measure **AES-2** would reduce this impact to less than significant.
- **Cultural Resources (Construction):** Construction of the Proposed Project has the potential to result in inadvertent impacts to potential archaeological deposits. Mitigation Measure **CR-5** would reduce this impact to less than significant.
- **Noise and Vibration (Operations):** Noise generated by the Proposed Project's operations, particularly noise from wheel squeal and wheel crossings over gaps in standards frogs for yard tracks would cause the two northern sections of the north OSF building to experience significant noise levels. Mitigation Measure **NV-1** would reduce this potential impact to less than significant.
- **Tribal Cultural Resources:** Construction of the Proposed Project has the potential to result in inadvertent impacts to potential Tribal Cultural Resources. Mitigation Measure **TCR-1** would reduce this impact to less than significant.

### 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)). Given the ongoing Metro Purple Line Extension Project, storage constraints that inhibit fleet expansion, and the absence of a turnback facility, the goal of the Proposed Project is to accommodate the expansion and associated increased ridership of the Metro Red and Purple Lines. The two objectives of the Proposed Project are:

Objective #1: Provide core capacity improvements needed to accommodate increased service levels on the Metro Red and Purple Lines.

Objective #2: Provide new tracks and switches that will allow trains to provide faster service times at Union Station.

## 6.4. ALTERNATIVES TO THE PROPOSED PROJECT

The CEQA statute, the CEQA Guidelines, and related recent 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, “The 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 and, if appropriate, an alternative site location should be analyzed. Other project alternatives may involve a modification of the proposed land uses, density, or other project elements at the same project location.

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 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 existing Rail Yard is constrained by non-Metro rail tracks and the Los Angeles River to the east and the Arts District to the west. There is no available space for growth to the north or south due to existing land use configurations. Construction of the new storage tracks associated with the Proposed Project can only occur adjacent to OSF when accounting for other Project components such as the new turnback facility. No alternative has been identified to avoid the heavy-duty equipment activity that would be required to demolish existing facilities and construction new facilities directly adjacent to OSF. Therefore, there are no feasible alternatives that would substantially reduce or avoid the Proposed Project’s significant and unavoidable noise impact.

On March 23, 2017, an IS/MND was adopted by the Metro Board of Directors for the former Red/Purple Line Core Capacity Improvements Project. On January 19, 2017, a motion by Metro Directors Garcetti, Solis, and Bonin was passed to make Metro’s top priority for

Division 20 to support the Purple Line Extension. The project assessed in the IS/MND does not meet operational requirements (e.g., a fleet consisting only of 6-car trains) for the Purple Line Extension and is not considered a potentially feasible project 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. 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 would not include development related to the Proposed Project and the existing Division 20 Rail Yard would not be expanded outside of the existing footprint. Accordingly, the 1<sup>st</sup> Street Bridge would not be modified, the commercial building at 100-120 North Santa Fe Avenue would not be repurposed for MOW activities, the National Cold Storage facility and the LAPD Viertel's Central Division Police Garage would not be demolished, and the Citizens Warehouse/Lysle Storage Company building would remain intact and no work would be done to preserve its historically significant features. Metro would not be able to operate the Purple Line Extension at optimal headways or support a fleet consisting only of 6-car trains. Metro Red and Purple Line trains would continue to enter the Division 20 Rail Yard through the existing set of switches. In addition, the No Project Alternative would not include streetscape improvements that add to community cohesion. Such improvements associated with the Proposed Project would be similar in character to those to be provided along portions of the east side of Center Street by the Eastside Access 1<sup>st</sup> & Central Project, which includes bike lanes, crosswalks, street trees, and street lighting, as well as those to be provided by the Metro Emergency Security Operations Center Project, which includes landscape elements and street lighting.

### **Alternatives 2 And 3 – Track Design Alternatives**

Alternatives 2 and 3 are grouped together because they have similar designs and result in similar environmental effects. Table 6.1 summarizes and contrasts the key components and features of these Alternatives. Alternatives 2 and 3 minimize or avoid impacts to the 1<sup>st</sup> Street Bridge by designing the tracks such that trains would be able to pass under existing arches instead of traversing where the Bridge's bents currently stand. Alternative 2 does not affect any bents and Alternative 3 affects two bents. The Proposed Project affects four bents. No design alternatives have been identified that avoid or minimize impacts to the National Cold Storage facility or the Citizens Warehouse/Lysle Storage Company building.

**Table 6.1. Project Alternative Design Features**

Alternative	Impacts to 1 <sup>st</sup> Street Bridge	Storage Yard Access from Existing Yard	Access between North and South Storage Yards	Train Lengths Allowed	Storage Capacity	Points of Failure /a/
Proposed Project	4 bents	Yes	Yes	6 cars	120	Multiple
2	None	Yes	Yes	6 cars	120 cars	1 only
3	2 bents	No	Yes	4 cars	118 cars	Multiple

/a/ Pieces of trackwork or single tracks, that if out of service, would block train access to the Rail Yard. Having multiple points of failure provides redundancy, allowing operations to continue in the case of a failure.  
Source: TY Lin, 2018.

## 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.

The alternatives analysis addresses the same environmental topics that were evaluated in Chapter 3 (i.e., Aesthetics, Air Quality, Cultural Resources, Energy Resources, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Noise and Vibration, 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, and significant unavoidable impacts are addressed in Section 4.2 Significant and Unavoidable Impacts. 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.

### 6.5.1. Analysis of No Project Alternative

#### Aesthetics

The No Project Alternative would not include physical changes to the Project Site that could affect aesthetics and views. The Project Site would continue to not be part of a scenic vista or within the sightline of a scenic vista. Similar to the Proposed Project, the No Project 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. Like the Proposed Project, the No Project Alternative would not create impacts on scenic vistas or highways during construction or operations. Unlike the Proposed Project, the No Project Alternative has no potential to cause significant impacts related to construction lighting during construction.

The No Project Alternative would not modify the 1<sup>st</sup> Street Bridge nor demolish the National Cold Storage facility or the LAPD Viertel’s Central Division Police Garage, and the Citizens Warehouse/Lysle Storage Company building would remain in its existing condition. No

streetscaping activities would occur along Center Street, and no ventilation shaft building would be constructed. Similar to the Proposed Project, the No Project Alternative would not degrade the existing visual character or quality of the Project Site and its surroundings during construction or operations. This impact would be less than what was identified for the Proposed Project, which was determined to be less than significant.

The No Project Alternative would not remove existing nighttime lighting or introduce new nighttime lighting. Glare diffusers would not be affixed to existing nighttime Division 20 Rail Yard lighting. Moreover, no structures would be constructed that could potentially block daylight or cast shadows. Similar to the Proposed Project, the No Project Alternative would not adversely affect day or nighttime views in the area. This impact would be less than what was identified for the Proposed Project, which was determined to be less than significant with mitigation.

### **Air Quality**

The No Project Alternative would not generate construction or operational pollutant emissions. There would be no construction activities and associated direct (e.g., diesel fuel for equipment) and indirect (e.g., electricity for temporary power) emissions. The No Project Alternative would have no impact related to construction emissions. 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 operate the Purple Line Extension at optimal headways or support a fleet consisting only of 6-car trains. It is anticipated that improved headways 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 Build Alternative. Operational impacts would be less than those of the Proposed Project, which were determined to be less than significant.

### **Cultural Resources**

The No Project Alternative would not result in ground disturbance, acquisition, and/or modification of historic properties. Unlike the proposed project, there would be no potential for construction activities to disturb archaeological or paleontological resources. The National Cold Storage facility and the Citizens Warehouse/Lysle Storage Company buildings would not be demolished or modified to support storage tracks. In addition, the 1<sup>st</sup> Street Bridge piers and superstructure would remain in the existing condition. This impact would be less than what was identified for the Proposed Project, which was determined to be significant and unavoidable.

## **Energy**

The No Project Alternative would not change the existing conditions at the Project Site. There would be no construction activities and associated direct (e.g., diesel fuel for equipment) and indirect (e.g., electricity for temporary power) energy use. The No Project Alternative would have no impact related to construction energy. Construction impacts would be less than those of the Proposed Project, which were determined to be less than significant.

The No Project Alternative would not change existing energy use associated with the Project Site. There would be no changes to electricity use, natural gas consumption, or vehicle fuels. The No Project Alternative would have no impact related to operational energy. Operational impacts would be less than the Proposed Project, which were determined to be less than significant. Importantly, the No Project Alternative would not support improved headways in the Metro transit system. It is anticipated that improved headways would reduce regional vehicle miles traveled by making the Metro system a more desirable mode of transportation, thereby indirectly reducing passenger vehicle fuel use.

## **Greenhouse Gas Emissions**

The No Project Alternative would not generate construction or operational GHG emissions. There would be no construction activities and associated direct (e.g., diesel fuel for equipment) and indirect (e.g., electricity for temporary power) emissions. The No Project Alternative would have no impact related to construction emissions. 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 operate the Purple Line Extension at optimal headways or support a fleet consisting only of 6-car trains. It is anticipated that improved headways 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 Build Alternative. Operational impacts would be less than those of the Proposed Project, which were determined to be less than significant.

## **Hazards and Hazardous Materials**

Unlike the Proposed Project, the No Project Alternative would not have potential to result in an impact related to the emission or handling of hazardous materials. Unlike the Proposed Project, the No Project Alternative would not have potential to disturb contaminated soil or transport contaminated construction materials, including demolition debris, due to construction activities. The Proposed Project has the benefit of removing possibly contaminated soil and building materials from the Project Site, which would not be realized under the No Project Alternative. The No Project Alternative would not change operating conditions at the Project Site and would not create new operational hazards.

The Project Site is within one-quarter mile of SCI-Arc. However, since there would be no construction or operational activities, the No Project Alternative would not result in impacts related to the hazardous emissions or the handling of hazardous materials, substances, or waste, within one-quarter mile of an existing or proposed school.

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. Impacts related to emergency access under the No Project Alternative would be less than those of the Proposed Project, which were determined to be less than significant.

The Project Site is not within the proximity of a private airstrip or near a wildland area. Like the Proposed Project, the No Project Alternative would not result in impacts related to airport hazards or wildfires.

### **Noise and Vibration**

The No Project Alternative would not include construction activities. The Project Site would not be disturbed using heavy-duty equipment and there would not be on-road truck trips. There would be no potential for construction noise and vibration impacts to OSF. This impact would be less than what was identified for the Proposed Project, which was determined to be significant and unavoidable.

The No Project Alternative would not physically modify the Project Site. The storage yards would not be constructed adjacent to OSF and increased train activity would not occur on the southern portion of the Project Site. The existing Rail Yard associated with the No Project Alternative would include sufficient space to store additional trains related to the Purple Line Extension. These trains would be stored on the southeastern portion of the Project Site, away from OSF and on the opposite side of the MOW building. Increased train activity would be shielded from OSF by the MOW building and there would be no potential for changes to noise and vibration impacts to OSF. This impact would be less than what was identified for the Proposed Project, which was determined to be less than significant with mitigation.

### **Tribal Cultural Resources**

The No Project Alternative would not result in ground disturbance and there would be no potential Tribal Cultural Resources impacts. This impact would be less than what was identified for the Proposed Project, which was determined to be less than significant with mitigation.

## **6.5.2. Analysis of Alternatives 2 and 3**

### **Aesthetics**

The Project Site is not part of a scenic vista or within the sightline of a scenic vista. Alternatives 2 and 3 would not introduce features that would obstruct or damage scenic resources such as trees, rock outcroppings, and historic buildings within a state scenic

highway. Alternatives 2 and 3 would not create impacts on scenic vistas or highways during construction or operations.

Alternatives 2 and 3 would modify the Citizens Warehouse/Lysle Storage Company building and demolish the National Cold Storage facility and the LAPD Viertel's Central Division Police Garage. They would also modify the streetscape along Center Street and construct a ventilation shaft building. Regarding the 1<sup>st</sup> Street Bridge, Alternative 2 would not remove any bents and Alternative 3 would remove four bents. The Proposed Project would not affect highly visible fascia girders, light posts, and railings. The removal of the bents is not considered a significant visual impact based on the limited views of the bridge piers, as discussed in Section 3.1 Aesthetics. Moreover, no new visible feature is being proposed that is visually incompatible with the existing bridge. The overall visual effect would be less than the Proposed Project, which would remove four bents.

Alternatives 2 and 3, would remove existing yard lighting and introduce new yard lighting. They would also introduce street lights along Center Street. These modifications could potentially result in significant impacts. Similar to the Proposed Project, impacts associated with Alternatives 2 and 3 would be less than significant with mitigation.

### **Air Quality**

Alternatives 2 and 3 would generate construction and operational pollutant emissions. Construction activities would directly (e.g., through diesel fuel for equipment) and indirectly (e.g., through electricity for temporary power) generate emissions. Regarding construction emissions, the SCAQMD significance thresholds are established in pounds per day of emissions. The various proposed modifications to the 1<sup>st</sup> Street Bridge would not change the conservative construction scenario involving equipment and trucks that was used to estimate maximum daily construction emissions associated with Alternatives 2 and 3. Daily construction emissions would be similar to those presented in Section 3.2 Air Quality. Alternatives 2 and 3 would not change energy use or daily trips at the Project Site. Similar to the Proposed Project, impacts associated with Alternatives 2 and 3 would be less than significant.

### **Cultural Resources**

Like the Proposed Project, Physical constraints due to track geometry and location necessitate the demolition of the National Cold Storage facility and the modification of the Citizens Warehouse/Lysle Storage Company building under both Alternatives 2 and 3. This would result in a significant and unavoidable impact related to cultural resources. However, Alternatives 2 and 3 would vary in their impacts to the 1<sup>st</sup> Street Bridge.

By allowing trains to pass under the 1<sup>st</sup> Street Bridge, Alternative 2 would completely avoid impacts to the 1<sup>st</sup> Street Bridge. Alternative 3, while still requiring the modification of the 1<sup>st</sup> Street Bridge, would impact half as many of the Bridge's bents as the Proposed Project would. Therefore, although their effects on the National Cold Storage facility and the Citizens Warehouse/Lysle Storage Company building would be considered significant unavoidable

impacts, Alternatives 2 and 3 would create a lesser impact to cultural resources than the Proposed Project. Alternative 2 would have a lesser impact to cultural resources than Alternative 3.

### **Energy**

Alternatives 2 and 3 would directly (e.g., through combusting diesel fuel for equipment) and indirectly (e.g., through consuming electricity for temporary power) consume energy resources. Daily construction and operational activities would be the same as presented for the Proposed Project in Section 3.4. In addition, operational electricity use, natural gas consumption, and vehicle fuel combustion would be the same as presented for Proposed Project. Similar to the Proposed Project, impacts associated with Alternatives 2 and 3 would be less than significant.

### **Greenhouse Gas Emissions**

Alternatives 2 and 3 would generate construction and operational GHG emissions. Construction activities would directly (e.g., through diesel fuel for equipment) and indirectly (e.g., through electricity for temporary power) generate emissions. The various proposed modifications to the 1<sup>st</sup> Street Bridge would not change the conservative construction scenario involving equipment and trucks that was used to estimate maximum daily construction emissions associated with Alternatives 2 and 3. Daily construction emissions would be the same as those presented in Section 3.5 Greenhouse Gases. Alternatives 2 and 3 would not change energy use or daily trips at the Project Site. Similar to the Proposed Project, impacts associated with Alternatives 2 and 3 would be less than significant. Alternative 2 would have slightly less potential to reduce GHG emissions as compared to the Proposed Project and Alternative 3, due to the reduction of train-length and slight reduction in number of cars under that alternative.

### **Hazards and Hazardous Materials**

Alternatives 2 and 3 include the same hazardous sites (namely DTSC sites with EnviroStor IDs 60000170, 60000171, 600001890, and 60000172) and hazardous materials (e.g., TPH, ACMs, LBP, universal waste, TWW, and methane) as the Proposed Project. Alternatives 2 and 3 would require the transport and disposal of hazardous waste and contaminated soils during demolition, excavation, and construction. The Alternatives would also require the same types of utility relocations that the Proposed Project requires and be at risk of the same accident or upset conditions. They would also occasionally use, store, and dispose of hazardous materials such as vehicle fuels, oils, solvents, and cleaners during operations. However, regulatory compliance measures would reduce impacts to less-than-significant levels. Similar to the Proposed Project, impacts associated with Alternatives 2 and 3 would be less than significant.

Alternatives 2 and 3 would also be within one-quarter mile of SCI-Arc. As such, these alternatives may result in a significant impact related to the hazardous emissions or the handling of hazardous materials, substances, or waste, within one-quarter mile of an existing or proposed school. However, regulatory compliance measures would reduce impacts to less-

than-significant levels. Similar to the Proposed Project, impacts associated with Alternatives 2 and 3 would be less than significant.

### **Noise and Vibration**

Alternatives 2 and 3 would result in the same construction and operational activities adjacent to OSF as assessed for the Proposed Project in Section 3.7. Heavy-duty equipment would be required to operate directly adjacent to OSF, which would result in significant noise and vibration levels. Operational activities associated with the new storage tracks and increased service at the MOW building would generate significant noise levels that would be mitigated with new frogs. A frog is the crossing point of two rails. Similar to the Proposed Project, Alternatives 2 and 3 would result in significant and unavoidable impacts related to construction noise and vibration and less-than-significant impacts with mitigation for operational noise.

### **Tribal Cultural Resources**

Consultation with the Gabrieleno Band of Mission Indians – Kizh Nation indicates that the Project Site and its vicinity have a high potential to contain buried human remains of Gabrieleno ancestry, and such resources, if present, would be considered a tribal cultural resource. During construction of Alternatives 2 and 3, it is possible that previously unidentified tribal cultural resources may be encountered, disturbed, or damaged. Similar to the Proposed Project, impacts associated with Alternatives 2 and 3 would be less than significant with mitigation.

## **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. In general, 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 Alternatives 2 and 3 relative to the Proposed Project is shown Table 6.2.

The No Project Alternative is considered the environmentally superior alternative because implementation of the Proposed Project would not occur. This would eliminate the significant and unavoidable impacts related to cultural resources (historic properties) and noise and vibration (construction) that would occur under the Proposed Project. However, the No Project Alternative would not achieve any of the project objectives.

If the No Project Alternative is identified as 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 it avoids the cultural resources impact to the 1<sup>st</sup> Street Bridge. This Alternative would not avoid the construction noise and vibration impacts of the Proposed Project, which would remain significant and unavoidable.

**Table 6.2. Comparison of Alternatives to the Proposed Project**

Environmental Resource	Proposed Project	Alternative 1	Alternative 2	Alternative 3
Aesthetics	LTS with Mitigation	None	LTS with Mitigation	LTS with Mitigation
Air Quality	LTS	None /a/	LTS	LTS
Cultural Resources	SU	None	None	SU
Energy	LTS	None /a/	LTS	LTS
Greenhouse Gas Emissions	LTS	None /a/	LTS	LTS
Hazards and Hazardous Materials	LTS	None	LTS	LTS
Noise and Vibration	SU (Construction)	None	SU (Construction)	SU (Construction)
Tribal Cultural Resources	LTS with Mitigation	None	LTS with Mitigation	LTS with Mitigation

*/a/ Full benefits to this resource from operating the Metro Purple Line Extension at optimal headways would be not be realized under this alternative.*

LTS = Less Than Significant; SU = Significant and Unavoidable

**Source: Terry A. Hayes Associates Inc., 2018.**