

## CHAPTER 5 COMPARISON OF ALTERNATIVES

### 5.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that an environmental impact report (EIR) describe a range of reasonable alternatives to the project or to the location of the project that could feasibly avoid or lessen any significant environmental impacts while substantially attaining the basic objectives of the project. 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.*

An EIR should also evaluate the comparative merits of the alternatives. This chapter describes potential alternatives that were considered but eliminated from further evaluation and the reasons for their dismissal. It also discusses two alternatives to the project that have been carried forward for analysis and assessment of potential environmental impacts: the No Project Alternative and the High Frequency Bus Alternative.

Feasible alternatives to the project are 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 accommodate an alternative.

### 5.2 PROJECT OBJECTIVES

Consistent with Section 15126.6(c) of the CEQA Guidelines, the range of alternatives include those that could feasibly accomplish the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The project objectives are:

- Leverage the high-volume east-west rail network to provide new north-south connections and close a regional network gap between the Metro K, E, D, and B Lines.
- Increase the efficiency and convenience of transit trips by providing faster and more direct service, in turn creating more connections and mobility options
- Reduce vehicle miles traveled and greenhouse gas emissions by providing an alternative to congested roadways by offering high-capacity, grade-separated transit to meet existing, growing demand

- Maximize access to jobs, housing, and opportunity through the implementation of frequent and reliable rail service
- Improve mobility for transit-dependent residents by providing alternatives to congestion with efficient transit service and a cohesive high-capacity and high-speed transit network

The K Line Northern Extension (KNE) Fairfax Alignment, the proposed project, and other light rail alignments studied, would achieve the project objectives. As discussed in Section 5.5, the No Project Alternative would not achieve any of the project objectives, and the High Frequency Bus Alternative would achieve the project objectives but to a lesser degree than the KNE Fairfax Alignment.

### 5.3 ALTERNATIVES CONSIDERED BUT ELIMINATED

Over the past decade, Metro has studied the feasibility of a wide range of alignments and modes to provide a north-south rail line in the Central Los Angeles vicinity. The development of alternatives is detailed in Appendix 2-A, Alternatives Considered but Withdrawn from Further Evaluation, which describes the other project alternatives considered and withdrawn based on their ability to address the project objectives, potential to cause significant effects, and feasibility considerations such as site suitability, economic viability, and availability of infrastructure. The most recent studies that evaluated project alternatives have included:

- *Crenshaw Northern Extension Feasibility/Alternatives Analysis Study* (Feasibility/AA Study) (2018) – presented the relative performance and cost of five light rail alternatives—Vermont, La Brea, Fairfax, La Cienega, and San Vicente (shown in Figure 5-1).
- *Crenshaw Northern Extension Advanced Alternatives Analysis Screening Study* (Advanced AA) (2020) – refinement of alternatives evaluated in the Feasibility/AA Study with the addition of the San Vicente Alternative Design Option 2 – Hybrid, now called the San Vicente–Fairfax Alignment (shown in Figure 5-2). This study concluded with the recommendation to advance the San Vicente–Fairfax Alignment, the Fairfax Alignment, and the La Brea Alignment for environmental evaluation and the reduction of at-grade and aerial segments.
- *Post-Scoping Alignment Refinement Evaluation* (Post-Scoping) (2021) – further refinement of the three alignments and stations, including elimination of the at-grade and aerial segment, to be studied in the Draft EIR and presented during public scoping in May 2021 (shown in Figure 5-3).

Metro conducted community outreach throughout the development of the studies, informing the development of alternatives, recommendations, and Metro decisions on alternatives considered and eliminated, as summarized in Table 5-1.

TABLE 5-1. SUMMARY OF ALTERNATIVES CONSIDERED BUT ELIMINATED

| STUDY/PHASE                                                  | ALTERNATIVES                                                                                        | REASON ELIMINATED                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|--------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Feasibility/<br>AA Study<br>(2018),<br>Advanced AA<br>(2020) | Aerial/At-Grade Vertical Configuration                                                              | <p>Eliminated aerial and at-grade configurations (with the exception of a segment along San Vicente Blvd between Venice Blvd and Fairfax Ave) due to:</p> <ul style="list-style-type: none"> <li>• Insufficient width within the public ROW (street)</li> <li>• Increase in traffic congestion due to potential lane closures</li> <li>• Roadway and property impacts</li> <li>• Other environmental and community considerations</li> </ul>                                                                     |
| Feasibility/<br>AA Study<br>(2018),<br>Advanced AA<br>(2020) | Vermont (Figure 5-1)                                                                                | <ul style="list-style-type: none"> <li>• Would fail to serve origins and destinations within study area.</li> <li>• Redundant with the existing rail system and all the western alignments, which connect riders to the D Line quicker than via Vermont.</li> <li>• Longer travel time for trips going north or west.</li> <li>• Would not serve any new neighborhoods/areas that would not be served with any of the other alternatives or are not already served by the existing Metro rail system.</li> </ul> |
| Advanced AA<br>(2020)                                        | San Vicente (Figure 5-1 and Figure 5-2)                                                             | <ul style="list-style-type: none"> <li>• Would result in a lengthy 1,300-foot-long (0.25-mile) transfer distance between K Line and the D Line at Wilshire/La Cienega Station. A seamless connection between the two lines is critical for system connectivity as a high volume of transfers is anticipated.</li> <li>• Dropped in favor of the San Vicente Design Option 2 – Hybrid (San Vicente–Fairfax) Alternative.</li> </ul>                                                                               |
| Advanced AA<br>(2020)                                        | San Vicente Design Option 1 – La Cienega (Figure 5-2)                                               | <ul style="list-style-type: none"> <li>• Would result in a lengthy 1,300-foot-long (0.25-mile) transfer distance between the project and the D Line at Wilshire/La Cienega Station.</li> <li>• Difficult to locate a station immediately adjacent to the La Cienega/Beverly intersection as well as the Santa Monica/La Cienega intersection due to alignment geometry constraints.</li> </ul>                                                                                                                   |
| Advanced AA<br>(2020)                                        | Extension farther north to Universal Studios, Burbank Media District, and Hollywood Burbank Airport | <ul style="list-style-type: none"> <li>• Beyond the objectives of the project (a connection between existing and proposed east-west Metro transit lines).</li> <li>• Not included in the Measure M funding allocated for the extension and would not meet the Measure M description.</li> <li>• Incorporated potential for future extension in design of KNE terminus.</li> </ul>                                                                                                                                |
| Advanced AA<br>(2020)                                        | Interline <sup>1</sup> with the Metro E Line                                                        | <ul style="list-style-type: none"> <li>• Would serve different travel patterns than identified in the objectives for the KNE project.</li> <li>• Would create constructability issues with interlining the underground K Line and the at-grade E Line due to structural needs and additional public ROW acquisition.</li> <li>• Insufficient E line capacity to accommodate additional rail service.</li> </ul>                                                                                                  |
| Advanced AA<br>(2020)                                        | Interline <sup>1</sup> with D Line from Crenshaw Blvd west, then continue north at San Vicente Blvd | <ul style="list-style-type: none"> <li>• Would not be feasible to operate and interline the K Line (light rail) with the D Line (heavy rail) due to the different technologies and vehicle sizes.</li> <li>• Would miss opportunities to bring rail transit service to new communities.</li> </ul>                                                                                                                                                                                                               |
| Post-Scoping<br>(2022)                                       | Aerial/At-Grade Vertical Configuration – San Vicente Blvd between Venice Blvd and Fairfax Ave       | <ul style="list-style-type: none"> <li>• Would be less cost-effective to construct a short segment of aerial/at-grade along San Vicente Blvd between Venice Blvd and Fairfax Ave than remain fully underground.</li> <li>• Although tunneling is more expensive than aerial/at-grade construction on a per-foot basis, the efficiencies of continuing to tunnel would make a fully underground alignment less costly.</li> </ul>                                                                                 |

| STUDY/PHASE         | ALTERNATIVES                                                                                                                          | REASON ELIMINATED                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|---------------------|---------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Post-Scoping (2022) | Santa Monica/La Cienega Optional Station (Figure 5-3)                                                                                 | <ul style="list-style-type: none"> <li>• Would serve a large portion of the station study area served by the proposed San Vicente/Santa Monica Station, which was within 0.5 mile of the Optional Santa Monica/La Cienega Station</li> <li>• Determined a single station would serve area on Santa Monica Blvd in lieu of two separate stations.</li> </ul>                                                                                                                                                                                                                                                                                                                                              |
| Post-Scoping (2022) | La Brea Alternative + Spur Line west along Santa Monica Blvd with transfer at Santa Monica/La Brea Station (proposed by stakeholders) | <ul style="list-style-type: none"> <li>• Would not provide a direct extension of the K Line (thereby jeopardizing Measure M funding).</li> <li>• Would not result in significant cost savings compared to the San Vicente–Fairfax Alternative.</li> <li>• Would not provide a direct north-south connection to West Hollywood and other key destinations in the study area.</li> <li>• Would require the construction of a complex and costly wye junction<sup>2</sup> at Santa Monica/La Brea to either access the MSF or provide interlining service.</li> <li>• Would limit headways, resulting in less frequent service along the branches unless major additional trackwork was provided</li> </ul> |
| Post-Scoping (2022) | Design Option 1 – Crenshaw Blvd Alignment between Crenshaw/Adams and Midtown Crossing                                                 | <ul style="list-style-type: none"> <li>• Would result in higher construction costs and operations and maintenance costs.</li> <li>• Would provide less direct connection with longer travel times between Crenshaw/Adams and Midtown Crossing stations.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                       |

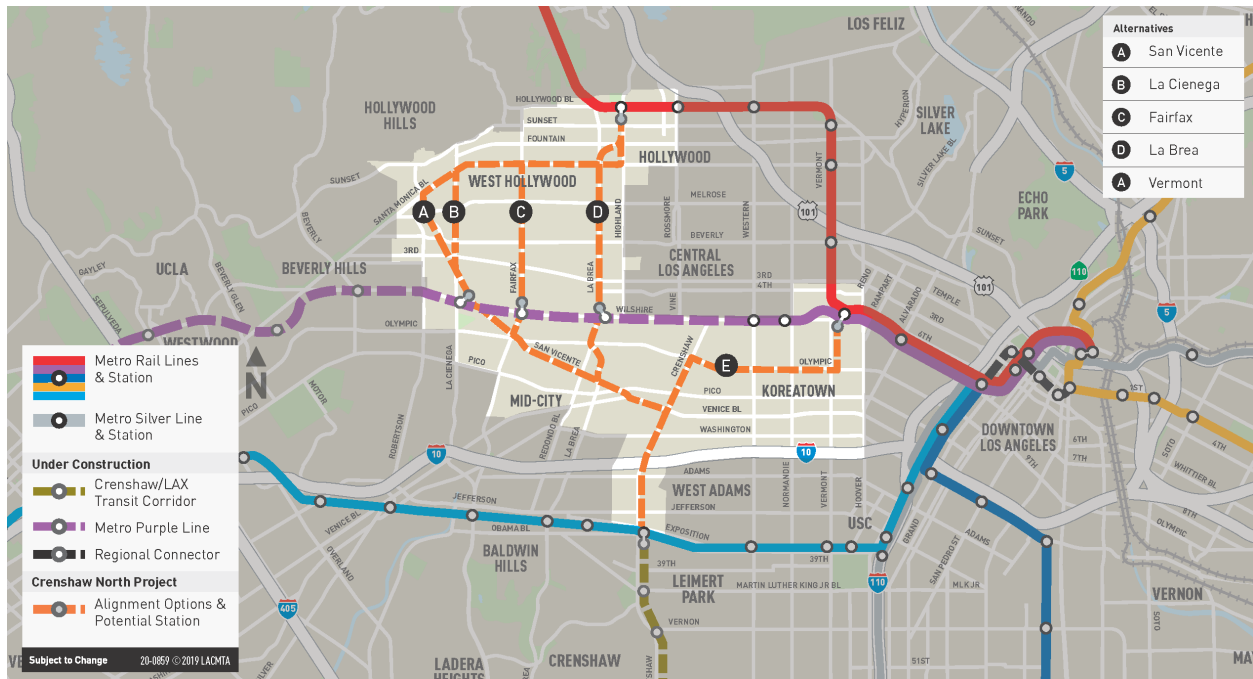
Source: Connect Los Angeles Partners 2024

<sup>1</sup> Interlining is where two routes share part of the same rail line; a physical connection is required between the tracks used by the different routes.

<sup>2</sup> A wye junction is a triangular configuration of rail tracks where three rail tracks join. This allows for flexibility in routing trains from any set of tracks to either of the other two sets of tracks.

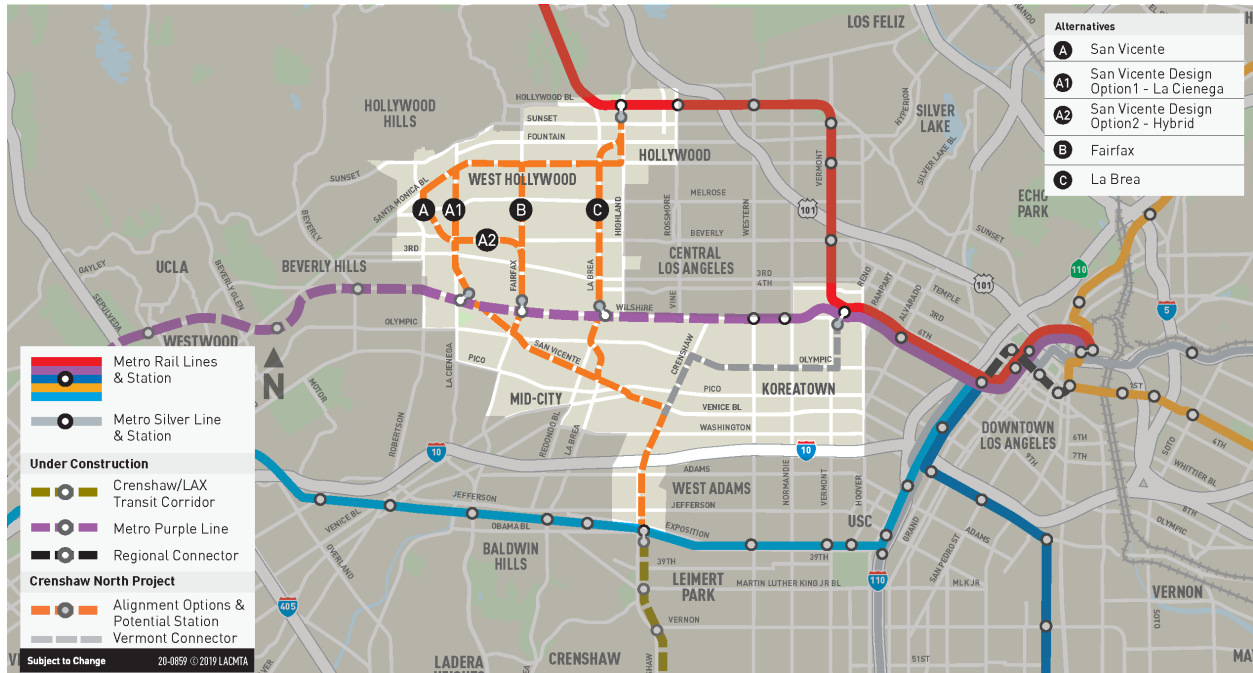
AA = Alternatives Analysis; HRT = heavy rail transit; KNE = K Line Northern Extension; LRT = light rail transit; MSF = maintenance and storage facility; ROW = right-of-way

FIGURE 5-1. FEASIBILITY/ALTERNATIVES ANALYSIS STUDY ALTERNATIVES (2018)



Source: Metro 2018

FIGURE 5-2. ADVANCED ALTERNATIVES ANALYSIS STUDY ALTERNATIVES (2020)



Source: Metro 2020a

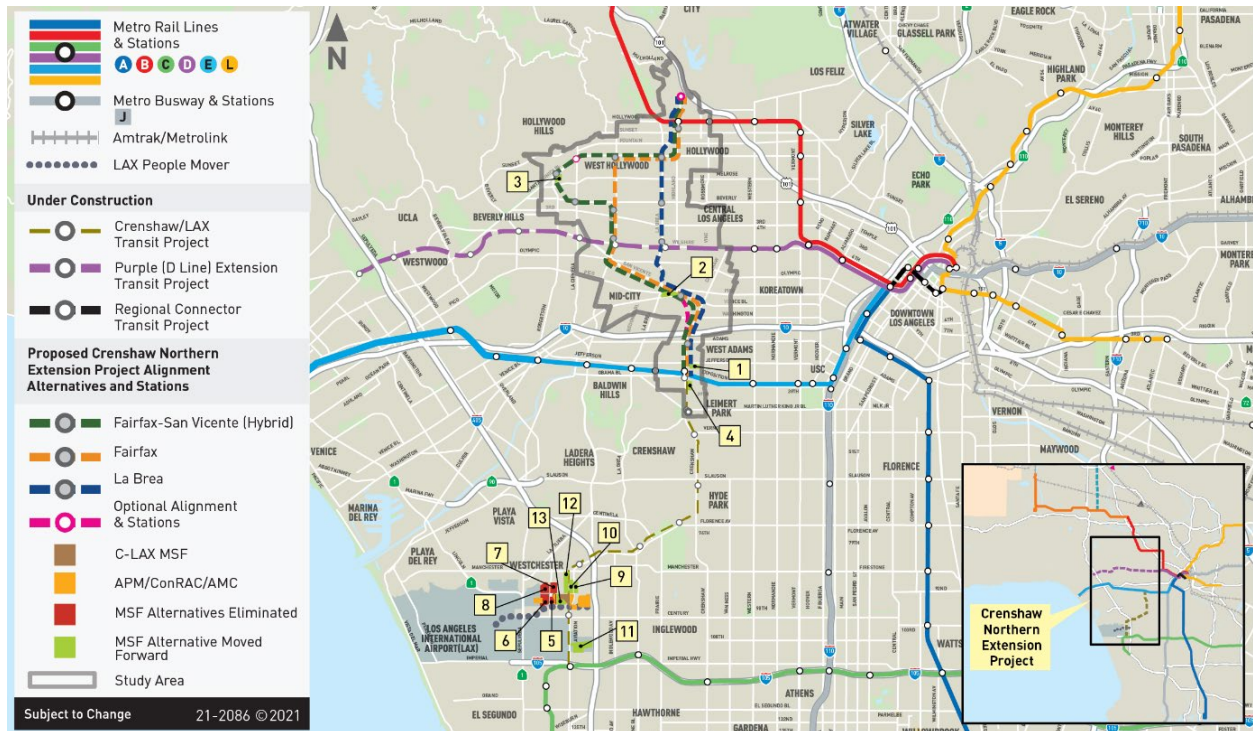
FIGURE 5-3. ALTERNATIVES AS PRESENTED AT SCOPING (2021)



Source: Connect Los Angeles Partners 2021

In addition to the evaluation of various alignments and stations, Metro considered and evaluated a range of maintenance and storage facility (MSF) site options. Eleven MSF site options were evaluated during the Advanced AA Study. As part of pre-scoping analysis, two additional MSF options were added, including an expansion of the existing Metro Division 16 yard, for a total of 13 site options as illustrated in Figure 5-4.

FIGURE 5-4. POTENTIAL MSF SITES CONSIDERED (2021)



Source: Connect Los Angeles Partners 2021

The MSF options were evaluated to ensure the MSF site fulfilled the following criteria:

- Meets minimum size requirement, which is based on fleet size and alignment length. The longest alignment evaluated during the Advanced AA stage required 13.3 acres.
- Compatible with adjacent land uses.
- Does not have a major existing or planned site conflict.
- Close to the K Line.

Following the 2020 Advanced AA Study and the 2022 Post-Scoping Alignment Refinement Evaluation screening processes, additional alignment refinements and operations analyses were conducted to confirm MSF size and location requirements. Twelve of the 13 MSF options were removed from consideration (Options 1-12). MSF Option 13, in the vicinity of Los Angeles International Airport, was recommended for inclusion in the Draft EIR. Although Option 13 is located south of Arbor Vitae Street, it would be an expansion of the existing Division 16 facility, rather than a new facility, and would use the same rail junction as Division 16.

Table 5-2 summarizes the screening of MSF options, which is discussed further in Appendix 2-A, Alternatives Considered but Withdrawn from Further Evaluation, of this Draft EIR.

**TABLE 5-2. MAINTENANCE AND STORAGE FACILITY SCREENING**

| OPTION                            | MSF OPTION LOCATION      | JURISDICTION   | PRIMARY REASON FOR DISQUALIFICATION                                                                                                                                    |
|-----------------------------------|--------------------------|----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                                 | 36th St                  | Los Angeles    | <ul style="list-style-type: none"> <li>• Minimum size requirement</li> <li>• Adjacent land use compatibility</li> </ul>                                                |
| 2                                 | Midtown Crossing         | Los Angeles    | <ul style="list-style-type: none"> <li>• Adjacent land use compatibility</li> </ul>                                                                                    |
| 3                                 | San Vicente/Santa Monica | West Hollywood | <ul style="list-style-type: none"> <li>• Minimum size requirement</li> <li>• Adjacent land use compatibility</li> </ul>                                                |
| 4                                 | Crenshaw/Expo            | Los Angeles    | <ul style="list-style-type: none"> <li>• Minimum size requirement</li> <li>• Adjacent land use compatibility</li> </ul>                                                |
| 5                                 | SE Airport/Arbor Vitae   | Los Angeles    | <ul style="list-style-type: none"> <li>• Major existing/planned site conflicts</li> <li>• Distance to the K Line</li> </ul>                                            |
| 6                                 | SW Airport/Arbor Vitae   | Los Angeles    | <ul style="list-style-type: none"> <li>• Major existing/planned site conflicts</li> <li>• Distance to the K Line</li> </ul>                                            |
| 7                                 | NE Airport/Arbor Vitae   | Los Angeles    | <ul style="list-style-type: none"> <li>• Major existing/planned site conflicts</li> <li>• Adjacent land use compatibility</li> <li>• Distance to the K Line</li> </ul> |
| 8                                 | NW Airport/Arbor Vitae   | Los Angeles    | <ul style="list-style-type: none"> <li>• Major existing/planned site conflicts</li> <li>• Adjacent land use compatibility</li> <li>• Distance to the K Line</li> </ul> |
| 9                                 | NE Aviation/Arbor Vitae  | Inglewood      | <ul style="list-style-type: none"> <li>• Distance to the K Line</li> </ul>                                                                                             |
| 10                                | NW Aviation/Arbor Vitae  | Inglewood      | <ul style="list-style-type: none"> <li>• Adjacent land use compatibility</li> <li>• Operations and Management costs</li> </ul>                                         |
| 11                                | 111th St                 | Los Angeles    | <ul style="list-style-type: none"> <li>• New facility and junction south of Arbor Vitae St</li> </ul>                                                                  |
| 12                                | NW Mainline/Arbor Vitae  | Los Angeles    | <ul style="list-style-type: none"> <li>• Adjacent land use compatibility</li> <li>• Operations and Management costs</li> </ul>                                         |
| 13 (selected as the proposed MSF) | West of C-LAX MSF        | Los Angeles    | <ul style="list-style-type: none"> <li>• Met screening criteria and advanced to Draft EIR</li> </ul>                                                                   |

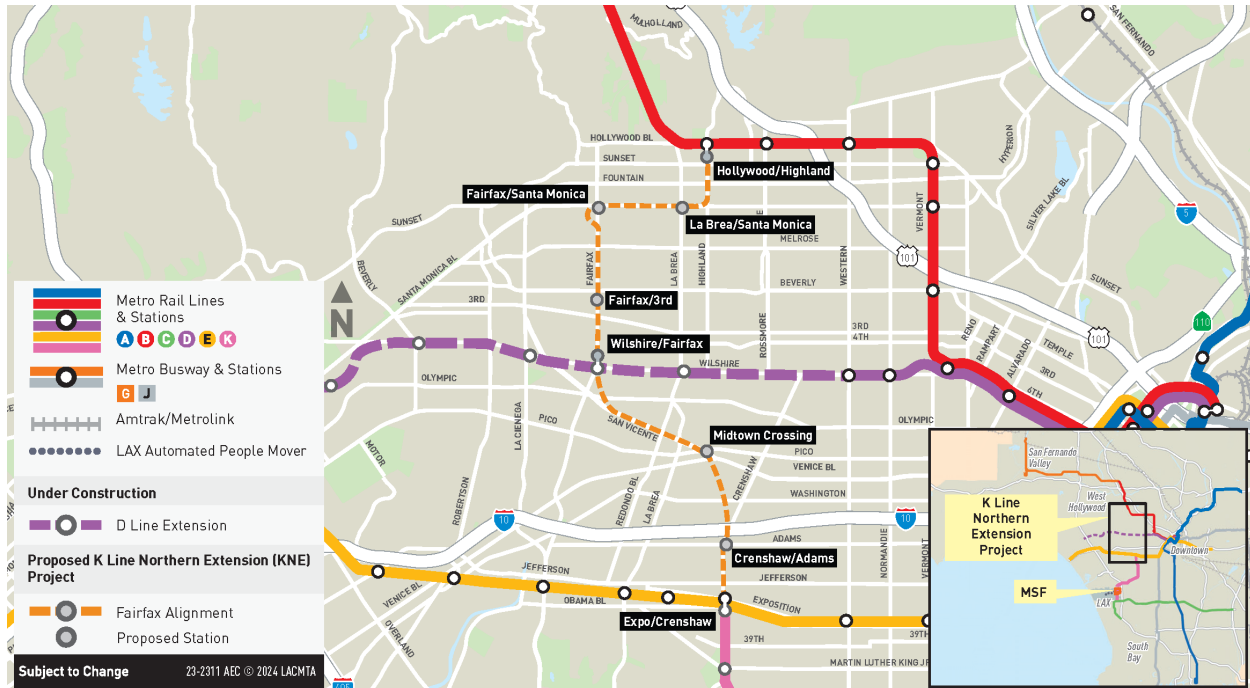
Source: Connect Los Angeles Partners 2024

EIR = environmental impact report; LAX = Los Angeles International Airport; MSF = maintenance and storage facility; SE = southeast; SW = southwest; NE = northeast; NW = northwest

## 5.4 ALTERNATIVES CONSIDERED

For the purposes of this Draft EIR, the proposed project is the KNE Fairfax Alignment, which would extend the K Line to the D Line, connecting to the Wilshire/Fairfax Station (under construction) and continue north to the B Line at the Hollywood/Highland Station (Figure 5-5). The two other rail alignments evaluated in the Draft EIR (San Vicente-Fairfax and La Brea) would also provide a rail connection to the D and B Lines. As such, the alternatives considered in this section are alternatives to a rail extension.

**FIGURE 5-5. KNE FAIRFAX ALIGNMENT (PROPOSED PROJECT)**



Source: Connect Los Angeles Partners 2024

### 5.4.1 NO PROJECT ALTERNATIVE

CEQA Guidelines Section 15126.6(e) requires preparation of a No Project Alternative, which assumes that Metro would not implement the project. The No Project Alternative provides a comparison of impacts that would occur without the KNE Fairfax Alignment and other rail alignments, evaluated within the context of existing and foreseeable transit enhancements including capital and operational transportation improvements. The No Project Alternative looks at forecasted conditions in Los Angeles County for the year 2045, including population and employment growth projections consistent with the Southern California Association of Governments (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SCAG 2020). Under the No Project Alternative, no new infrastructure would be built, aside from transit and highway projects currently under construction or projects funded for construction, environmentally cleared, planned to be in operation by 2045, and identified in the adopted Metro Long Range Transportation Plan (Metro 2020b) and the SCAG 2020-2045 RTP/SCS, as well as additional projects funded by the Measure M sales tax initiative approved by voters in November 2016.

Table 5-3 lists the transit and freeway projects assumed in the No Project Alternative. Figure 5-6 illustrates the assumed Metro transit projects in the region under the No Project Alternative.

**TABLE 5-3. NO PROJECT ALTERNATIVE PLANNED IMPROVEMENTS (2045)**

| PROJECT TYPE                                                        | PROJECT <sup>1</sup>                                                 | TO/FROM                                                |
|---------------------------------------------------------------------|----------------------------------------------------------------------|--------------------------------------------------------|
| Rail (Under Construction/Planned) <sup>1</sup>                      | Metro D Line Extension Project                                       | Wilshire/Western to Westwood/Veterans Affairs Hospital |
|                                                                     | Metro C Line Extension Project <sup>2</sup>                          | Redondo Beach to Torrance                              |
|                                                                     | Metro K Line <sup>3</sup>                                            | Westchester/Veterans to Aviation/LAX                   |
|                                                                     | Metro Eastside Transit Corridor Phase 2                              | Atlantic to Lambert                                    |
|                                                                     | Metro Foothill Extension to Montclair                                | Azusa to Montclair                                     |
|                                                                     | Metro Sepulveda Transit Corridor Project                             | Van Nuys Metrolink Station to Metro E Line             |
|                                                                     | Metro East San Fernando Valley Light Rail Transit Project            | Sylmar to Metro G Line Van Nuys Station                |
|                                                                     | Metro Southeast Gateway Line Transit Corridor Project                | Slauson to Pioneer                                     |
|                                                                     | Los Angeles World Airport Automated People Mover                     | Consolidated Rent-A-Car Facility to LAX Terminals      |
| Bus and Bus Rapid Transit (Under Construction/Planned) <sup>4</sup> | Metro G Line Bus Rapid Transit Improvement Project                   | North Hollywood to Chatsworth                          |
|                                                                     | Metro Vermont Transit Corridor                                       | 120th St to Hollywood Blvd                             |
|                                                                     | Metro North San Fernando Valley Transit Corridor                     | Northridge to North Hollywood                          |
|                                                                     | Metro North Hollywood to Pasadena Bus Rapid Transit Corridor Project | North Hollywood to Pasadena                            |
|                                                                     | Lincoln Boulevard Bus Rapid Transit                                  | Santa Monica to LAX                                    |
|                                                                     | La Brea Avenue Bus Priority Lanes (Peak Period Only)                 | Coliseum St to Sunset Blvd                             |
|                                                                     | NextGen Bus Network                                                  | Various locations                                      |
| Freeway (Under Construction/Planned) <sup>5</sup>                   | I-5 North Capacity Enhancements                                      | SR 14 to Lake Hughes Rd                                |
|                                                                     | I-405 (Sepulveda Pass) Express Lanes Project                         | I-10 to US-101                                         |
|                                                                     | SR 57/SR-60 Interchange Improvements                                 | SR-70/SR-60                                            |
|                                                                     | I-105 Express Lane                                                   | I-405 to I-605                                         |
|                                                                     | I-5 Corridor Improvements                                            | I-605 to I-710                                         |

Source: Connect Los Angeles Partners 2024

<sup>1</sup> Planned projects may be subject to change.

<sup>2</sup> Under the No Project Alternative, the Metro C Line would operate from LAX/Metro Transit Center to Norwalk.

<sup>3</sup> The Metro C Line extension to Torrance would operate as a southern extension of the K Line. Under the No Project Alternative, the K Line would operate from Expo/Crenshaw to Torrance.

<sup>4</sup> The municipality bus system network is based on service patterns for Los Angeles Department of Transportation DASH and Commuter Express, West Hollywood CityLine, Santa Monica Big Blue Bus, Culver CityBus, and Antelope Valley Transit Authority.

LAX = Los Angeles International Airport

FIGURE 5-6. NO PROJECT ALTERNATIVE PLANNED METRO TRANSIT MAP (2045)



Source: Connect Los Angeles Partners 2024

<sup>1</sup> Under the No Project Alternative, the Metro C Line would operate from LAX/Metro Transit Center to Norwalk and the Metro K Line would operate from Expo/Crenshaw to Torrance.

## 5.4.2 HIGH FREQUENCY BUS ALTERNATIVE

The High Frequency Bus (HFB) Alternative consists of a Metro implemented and operated rapid bus service instead of a light rail extension to connect the terminus of the Metro K Line at the Expo/Crenshaw Station to the Metro D Line at the Wilshire/La Brea Station and the Metro B Line at the Hollywood/Highland Station via Crenshaw Boulevard, Venice Boulevard, San Vicente Boulevard, La Brea Avenue, Hollywood Boulevard, Highland Avenue, and Sunset Boulevard (Figure 5-7). The HFB Alternative would serve the La Brea Avenue corridor instead of the Fairfax Avenue corridor because La Brea Avenue is the shortest route to connect the K, E, B, and D Lines and has existing enhanced bus infrastructure in some areas (La Brea Avenue Bus Priority Lanes). Under this alternative, 12 bus stops would be retrofitted between Exposition Boulevard and Hollywood/Highland, with approximately 0.5-mile spacing consistent with Metro guidelines for station spacing in urban corridors for bus rapid transit:

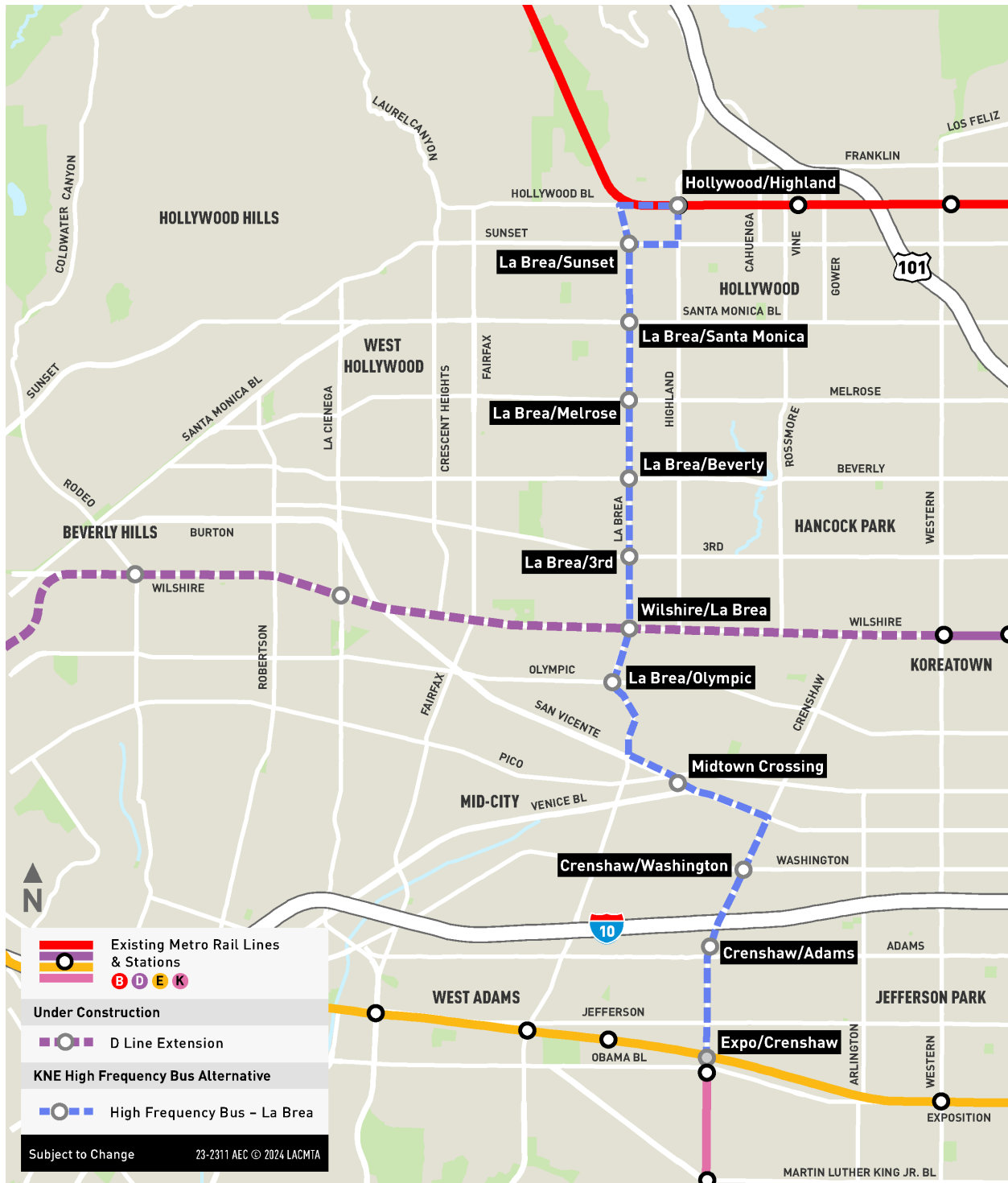
- |                                                 |                                             |
|-------------------------------------------------|---------------------------------------------|
| ■ Expo/Crenshaw (connection to K/E Line)        | ■ La Brea/3 <sup>rd</sup>                   |
| ■ Crenshaw/Adams                                | ■ La Brea/Beverly                           |
| ■ Crenshaw/Washington                           | ■ La Brea/Melrose                           |
| ■ Midtown Crossing (Pico-Rimpau Transit Center) | ■ La Brea/Santa Monica                      |
| ■ La Brea/Olympic                               | ■ La Brea/Sunset                            |
| ■ Wilshire/La Brea (connection to D Line)       | ■ Hollywood/Highland (connection to B Line) |

The HFB Alternative would introduce a new bus route in addition to existing bus service along Crenshaw Boulevard (Line 210), Venice Boulevard (Line 33), San Vicente Boulevard (Line 30), and La Brea Avenue (Line 212). The proposed bus stops for the HFB Alternative would be located at existing Metro bus stops. The HFB Alternative would operate as a rapid bus service with some bus rapid transit characteristics, including:

- Headways similar to those proposed for light rail (five minute peak period headways).
- Transit signal priority systems, which give priority to transit vehicles at signalized intersections by enabling an early green signal or holding a green signal, pending city approval.
- Enhanced bus stop amenities, including the installation of new signs at bus stops and shelters, as well as solar-powered lighting, benches, and trash receptacles.
- Low-floor electric buses to allow for faster and easier boarding and alighting. The charging infrastructure required for Metro's battery-electric bus fleet would be planned to accommodate the additional fleet required for operation of the HFB Alternative.
- No dedicated lanes with the exception of where they already exist along La Brea Avenue north of Olympic Boulevard and those that are planned for Hollywood Boulevard and La Brea Avenue south of Olympic Boulevard.

The construction and operation of the HFB Alternative would be within the public ROW and would include minor improvements such as travel lane restriping, curb extensions, elimination of street parking, and bus stop amenities, where feasible. The HFB Alternative would not require a separate maintenance facility, as buses would utilize and be maintained at existing Metro facilities, including Division 5 in Hyde Park or Division 7 in West Hollywood.

FIGURE 5-7. HIGH FREQUENCY BUS ALTERNATIVE



Source: Connect Los Angeles Partners 2024

## 5.5 ANALYSIS OF ALTERNATIVES

Under CEQA Guidelines Section 15126.6(d), each alternative should be evaluated in sufficient detail to allow meaningful evaluation, analysis, and comparison with the proposed project. While three KNE light rail alignments are analyzed equally in this Draft EIR, the proposed project is the KNE Fairfax Alignment, which would extend the K Line to the D Line at the Wilshire/Fairfax Station and the B Line at the Hollywood/Highland Station. Therefore, the following sections compare the impacts of the No Project Alternative and the HFB Alternative to KNE Fairfax Alignment only. The alternatives analysis addresses the same environmental topics that were evaluated in Chapter 3, Environmental Analysis. The following sections describe the impacts of the No Project Alternative and the HFB Alternative.

### 5.5.1 KNE FAIRFAX ALIGNMENT (PROPOSED PROJECT)

As discussed earlier, while three KNE light rail alignments are evaluated in detail in Chapter 3, for the purposes of this Draft EIR, the proposed project is the KNE Fairfax Alignment. Therefore, the alternatives considered in this section are alternatives to the KNE Fairfax Alignment.

Sections 3.1 through 3.19 of this Draft EIR analyze the environmental impacts of the KNE Fairfax Alignment. Where applicable, these sections identify feasible mitigation measures that could avoid or reduce significant impacts and identify whether the mitigation measures would reduce these impacts to a less than significant level. Chapter 3 also identifies the significant cumulative impacts resulting from the combined effects of the project and related past, present, and reasonably probable future projects. The KNE Fairfax Alignment impact analysis conclusions are summarized in Table 5-4.

### 5.5.2 NO PROJECT ALTERNATIVE

The following sections discuss the construction and operational impacts of the No Project Alternative.

#### 5.5.2.1 AESTHETICS

##### CONSTRUCTION

**Less Than Significant Impact.** The No Project Alternative would not construct a new light rail line between the K, E, D, and B Lines. While construction activities associated with a light rail line would not occur in the project area, other development in the region would continue, thus potentially causing temporary construction disruptions. New development, redevelopment, or other infrastructure related to growth projections in the SCAG 2020-2045 RTP/SCS would also be required to be consistent with local planning documents and policies and to comply with local ordinances and regulations, including those related to visual character and quality, scenic quality, and public views. Therefore, the No Project Alternative would have a less than significant impact during construction related to aesthetics.

##### OPERATION

**Less Than Significant Impact.** The No Project Alternative would not operate a new light rail line between the K, E, D, and B Lines, but other development in the region would continue, thus potentially altering the visual character within Central Los Angeles. New development, redevelopment, or other infrastructure related to growth projections in the SCAG 2020-2045 RTP/SCS would also be required to be consistent with local planning documents and policies and to comply with local ordinances and regulations, including

those related to visual character and quality, scenic quality, and public views. Therefore, the No Project Alternative would have a less than significant impact during operation related to aesthetics.

### 5.5.2.2 AIR QUALITY

#### CONSTRUCTION

**Less Than Significant Impact.** The No Project Alternative would not construct a new light rail line between the K, E, D, and B Lines; however, construction activities associated with other planned developments in the region would occur that have the potential to increase criteria pollutants or emissions or expose sensitive populations to concentrated pollutants. Other planned developments would be required to complete their own assessment of air quality impacts and develop appropriate mitigation. Therefore, the No Project Alternative would have a less than significant impact during construction related to air quality.

#### OPERATION

**Significant and Unavoidable Impact.** Under the No Project Alternative, no new, high-quality transit would operate between the Metro K, E, D, and B Lines, which is inconsistent with the transit network assumptions in the 2020-2045 SCAG RTP/SCS. As a result, the No Project Alternative would not decrease the vehicle miles traveled (VMT) and, therefore, would not result in associated air quality improvements from private automobile trips that would have shifted to light rail as assumed in the 2020-2045 SCAG RTP/SCS. Therefore, the No Project Alternative would have a significant and unavoidable impact during operation related to air quality with respect to consistency with applicable air quality plans.

### 5.5.2.3 BIOLOGICAL RESOURCES

#### CONSTRUCTION

**Less Than Significant Impact.** Under the No Project Alternative, the light rail alignment between the K, E, D, and B Lines would not be constructed, but other planned development in the area would continue. This area of Los Angeles is considered to be bat roosting habitat because some bat species with potential to be in the area are migratory and could be found in counties throughout the state. In addition, for birds protected under the Migratory Birds Treaty Act and for special-status bat species, the nesting and foraging habitat includes trees in the area. Nesting and roosting substrate removal due to current and future development in the vicinity of the project is the biggest threat to bird species (U.S. Fish and Wildlife Service 2023). While the construction of light rail would not affect these species, the other ongoing development in the vicinity has the potential to result in impacts. The other developments would be required to complete their own independent environmental review and identify appropriate impacts and mitigations. As a result, the No Project Alternative would have a less than significant impact during construction related to biological resources.

#### OPERATION

**No Impact.** The No Project Alternative would not operate a new light rail line between the K, E, D, and B Lines. While other development is likely to continue to proceed, any impact to sensitive species would likely occur during construction activities, not operation. Therefore, the No Project Alternative would have no impact related to biological resources during operation.

#### 5.5.2.4 COMMUNITIES, POPULATION, AND HOUSING

##### CONSTRUCTION

**Less Than Significant Impact.** Under the No Project Alternative, the light rail between the K, E, D, and B Lines would not be constructed. Development in the proposed project area would likely continue as planned in the SCAG 2020-2045 RTP/SCS. The planned developments would be required to complete their own CEQA clearance and identify property acquisitions, structure demolition, and construction. No population growth beyond that already anticipated in the SCAG growth projections for the region and in local community plans would occur either directly or indirectly. Therefore, the No Project Alternative would have a less than significant impact during construction related to communities, population, and housing.

##### OPERATION

**Less Than Significant Impact.** Under the No Project Alternative, the light rail line between the K, E, D, and B Lines would not be constructed. Since the KNE light rail would not be constructed as identified in the SCAG 2020-2045 RTP/SCS, the projected population and employment growth that would be supported by KNE may be more limited with reduced transit access. Therefore, the No Project Alternative would have a less than significant impact during operation related to communities, population, and housing.

#### 5.5.2.5 CULTURAL AND PALEONTOLOGICAL RESOURCES

##### CONSTRUCTION

**Less Than Significant Impact.** Under the No Project Alternative, the light rail extension between the E, D, and B Lines would not be constructed. The potential that other development, consistent with local plans, would affect historical, archaeological or paleontological resources during construction is determined by a variety of factors, including the type of development that is proposed. Ground-disturbing development would have the potential to impact sensitive archaeological and paleontological resources. Any planned developments would be required to complete their own independent environmental review and identify appropriate impacts and mitigations related to cultural and paleontological resources. Therefore, the No Project Alternative would have a less than significant impact during construction related to cultural and paleontological resources.

##### OPERATION

**No Impact.** Under the No Project Alternative, a light rail extension between the K, E, D, and B Lines would not operate. Although planned development in the area is likely to continue, potential impacts to cultural or paleontological resources are more likely to occur during the construction phase with demolition or ground-disturbing activities as discussed above rather than during operation. Therefore, the No Project Alternative would have no impact during operation related to cultural and paleontological resources.

### 5.5.2.6 ENERGY

#### CONSTRUCTION

**Less Than Significant Impact.** The No Project Alternative would not construct a new light rail line connecting the K, E, D, and B Lines; however, construction activities associated with other planned developments in the region would occur that have the potential to increase energy consumption. Other planned developments would be required to complete their own assessment of energy impacts and develop appropriate mitigation. Therefore, the No Project Alternative would have a less than significant impact during construction related to energy.

#### OPERATION

**Less Than Significant Impact.** Under the No Project Alternative, new sources of energy consumption would be introduced with the developments planned for the region. Due to the lack of light rail connecting the K, E, D, and B Lines, the No Project Alternative would not contribute to a regional VMT reduction; therefore, it would not decrease the consumption of energy used by private automobile trips that would have shifted to light rail as assumed in the 2020-2045 SCAG RTP/SCS. Therefore, the No Project Alternative would have a less than significant impact during operation related to energy since the energy reduction is less than would be anticipated with KNE operation.

### 5.5.2.7 GEOLOGY AND SOILS

#### CONSTRUCTION

**Less Than Significant Impact.** The No Project Alternative would not construct a new light rail line between the K, E, D, and B Lines. However, other planned development in the area could result in ground-disturbing activities and would have the potential to impact geology and soils. Impacts related to geology, soils, seismicity, and mineral resources are generally site-specific and localized. Projected future development would also be required to comply with all applicable standards, requirements, and guidance. Any planned developments would be required to complete their own independent environmental review and identify appropriate impacts and mitigations related to geology and soils. Therefore, the No Project Alternative would have a less than significant impact during construction related to geology and soils.

#### OPERATION

**No Impact.** The No Project Alternative would not operate a new light rail line between the K, E, D, and B Lines. The potential for impacts to geology and soils are more likely during construction of other development in the region than operation of the project. Therefore, the No Project Alternative would have no impact during operation related to geology and soils.

### 5.5.2.8 GREENHOUSE GAS EMISSIONS

#### CONSTRUCTION

**Less Than Significant Impact.** The No Project Alternative would not construct a new light rail line connecting the K, E, D, and B Lines. However, construction activities associated with other planned

developments in the region would occur that have the potential to increase greenhouse gas (GHG) emissions or conflict with applicable plans. Other planned developments would be required to complete their own assessment of greenhouse gas emissions and develop appropriate mitigation. Therefore, the No Project Alternative would have a less than significant impact during construction related to GHG emissions.

## OPERATION

**Significant and Unavoidable Impact.** The No Project Alternative would not involve operation of a light rail extension between the K, E, D, and B Lines. However, the No Project Alternative would not be consistent with the 2020-2045 SCAG RTP/SCS or California's goal to increase mass transit under Assembly Bill 32. It would not decrease the VMT associated with private automobile trips that would have shifted to light rail as assumed in the 2020-2045 SCAG RTP/SCS. Therefore, the No Project Alternative would have a significant and unavoidable impact during operation related to GHG emissions.

### 5.5.2.9 GROWTH INDUCING IMPACTS

## CONSTRUCTION

**No Impact.** Under the No Project Alternative, the light rail extension connecting the K, E, D, and B Lines would not be constructed. Development is anticipated to continue in the region consistent with the SCAG-adopted growth projections. The No Project Alternative would not result in unanticipated population growth or economic growth. Therefore, the No Project Alternative would have no impact during construction related to growth inducing impacts.

## OPERATION

**Less than Significant Impact.** While development is anticipated to continue in the region consistent with SCAG-adopted growth projections, the No Project Alternative could limit alternatives to automobile travel; and limit transit choices for residents, visitors, and employees in the vicinity of the planned KNE alignments. However, other transit and transportation improvements in the region would be implemented and completed, which would accommodate forecasted growth and development consistent with local and regional plans across the region. Any projected future development would be approved solely at the discretion of the Cities of Los Angeles and West Hollywood and would be subject to all applicable requirements and regulations of local jurisdictions. It is anticipated that any potential growth inducing impacts would be addressed and mitigated by restrictions imposed by local jurisdictions. Changes in demographics associated with new development opportunities are anticipated to be consistent with the SCAG-adopted growth projections, which are based on the general plan land use designations of the Cities of Los Angeles and West Hollywood. Indirect economic growth is not anticipated from the No Project Alternative. Therefore, the No Project Alternative would have a less than significant impact during operation related to growth inducing impacts.

### 5.5.2.10 HAZARDS AND HAZARDOUS MATERIALS

#### CONSTRUCTION

**Less Than Significant Impact.** The No Project Alternative would not construct a new light rail line connecting the K, E, D, and B Lines but other planned development is anticipated to continue in the region. The construction of individual planned developments or projects may require the transport or storage of hazardous materials, ground disturbance or excavation that could encounter contaminated groundwater or soil, and demolition of existing structures that could release hazardous materials depending on the type and location of the development. Any planned developments would be required to complete their own independent environmental review and identify appropriate impacts and mitigations related to hazards and hazardous materials. Therefore, the No Project Alternative would have a less than significant impact during construction related to hazards and hazardous materials.

#### OPERATION

**No Impact.** The No Project Alternative would not operate a new light rail line connecting the K, E, D, and B Lines but other planned development is anticipated to continue in the region. Any ground disturbance or use of hazardous materials would most likely be associated with the construction phase of other developments or projects and would not pose a risk during operation. Therefore, the No Project Alternative would have no impact during operation related to hazards and hazardous materials.

### 5.5.2.11 HYDROLOGY AND WATER QUALITY

#### CONSTRUCTION

**Less Than Significant Impact.** The No Project Alternative would not construct a new light rail line connecting the K, E, D, and B Lines. Other planned developments and projects are anticipated to continue in the region and have the potential to result in impacts to surface or groundwater resources, and existing drainage facilities. Any planned developments would be required to complete their own independent environmental review and identify appropriate impacts and mitigations related to hydrology and water quality. Therefore, the No Project Alternative would have a less than significant impact during construction related to hydrology and water quality.

#### OPERATION

**Less Than Significant Impact.** The No Project Alternative would not operate a new light rail line connecting the K, E, D, and B Lines. Other planned developments and project operations may have the potential to introduce new pollutants to surface or groundwater, increase in impervious surfaces, or impact existing drainage patterns and runoff quantities. Any planned developments would be required to complete their own independent environmental review and identify appropriate impacts and mitigations related to hydrology and water quality. Therefore, the No Project Alternative would have a less than significant impact during operation related to hydrology and water quality.

### 5.5.2.12 LAND USE AND PLANNING

#### CONSTRUCTION

**No Impact.** Under the No Project Alternative, the light rail between the K, E, D, and B Lines would not be constructed. Development in the proposed project area would be likely to continue as planned in the SCAG 2020-2045 RTP/SCS, informed by the City of Los Angeles and City of West Hollywood General Plans. Therefore, the No Project Alternative would have no impact during construction related to land use and planning.

#### OPERATION

**Significant and Unavoidable Impact.** The No Project Alternative would not operate a new transit line connecting the K, E, D, and B Lines and therefore would not be consistent with the 2020-2045 SCAG RTP/SCS, which includes KNE. Therefore, the No Project Alternative would have a significant and unavoidable impact during operation related to land use and planning.

### 5.5.2.13 NOISE AND VIBRATION

#### CONSTRUCTION

**Less than Significant Impact.** The No Project Alternative would not construct a new light rail line connecting the K, E, D, and B Lines. It is anticipated that planned development will occur in the vicinity, and the general levels of noise and vibration are anticipated to be similar to existing conditions as the regular construction of similar-scale development that has occurred in the past would continue. It is anticipated these other projects would adhere to local noise ordinances during construction. Any planned developments would be required to complete their own independent environmental review and identify appropriate impacts and mitigations related to noise and vibration. Therefore, the No Project Alternative would have a less than significant impact during construction related to noise and vibration.

#### OPERATION

**Less than Significant Impact.** The No Project Alternative would not operate a new light rail line between the K, E, D, and B Lines. The existing transportation network and land use developments would continue to operate and generate operational noise, and the transportation improvements identified in Section 5.4.1 would increase the ambient noise and vibration. Therefore, the No Project Alternative would have a less than significant impact during operation related to noise and vibration.

### 5.5.2.14 PUBLIC SERVICES AND RECREATION

#### CONSTRUCTION

**Less than Significant Impact.** The No Project Alternative would not construct a new light rail line connecting the K, E, D, and B Lines. It is anticipated that the planned development in the vicinity will be consistent with local land use plans, community/specific plans, and general plans. Future development in the area would be subject to a discretionary review process that would ensure that developments are consistent with the goals and policies of the City of Los Angeles and the City of West Hollywood. Therefore, the No Project Alternative would have a less than significant impact during construction related to public services.

## OPERATION

**Less than Significant Impact.** The No Project Alternative would not operate a new light rail line between the K, E, D, and B Lines. It is anticipated that the planned development in the vicinity will be consistent with local land use plans, community/specific plans, and general plans. Future development in the area would be subject to a discretionary review process that would ensure that developments are consistent with the goals and policies of the City of Los Angeles and the City of West Hollywood. The expected increase in regional traffic congestion could result in reduced emergency service response times. However, emergency service dispatch has real-time traffic conditions, so the potential for emergency service response delay is small. Therefore, the No Project Alternative would have a less than significant impact during operation related to public services.

### 5.5.2.15 TRANSPORTATION

## CONSTRUCTION

**Less than Significant Impact.** The No Project Alternative would not construct a new light rail line connecting the K, E, D, and B Lines. Other planned developments and projects in the region are anticipated to follow local guidance and regulations during construction activities. As a result, they would not be inconsistent with applicable plans, ordinances, or policy. The construction of other planned developments and projects in the vicinity have the potential to increase vehicle trips, create hazards, or affect emergency access. Any planned developments or projects would be required to complete their own independent environmental review and identify appropriate impacts and mitigations related to transportation. Therefore, the No Project Alternative would have a less than significant impact during construction related to transportation.

## OPERATION

**Significant and Unavoidable Impact.** Under the No Project Alternative, a light rail line connecting the K, E, D, and B Lines will not be introduced, although other planned transportation improvements identified in the SCAG 2020-2045 RTP/SCS are anticipated to be complete. The completion of developments and other transportation projects have the potential to increase vehicle trips, create hazards, or affect emergency access. In addition, the No Project Alternative would not be consistent with the 2020-2045 SCAG RTP/SCS, which includes KNE. Therefore, the No Project Alternative would have a significant and unavoidable impact during operation related to transportation.

### 5.5.2.16 TRIBAL CULTURAL RESOURCES

## CONSTRUCTION

**Less than Significant Impact.** Under the No Project Alternative, a light rail line connecting the K, E, D, and B Lines would not be constructed. The potential that other development, consistent with local plans, would affect tribal cultural resources during construction is determined by a variety of factors, including the type of development that is proposed. Ground-disturbing development would have the potential to impact sensitive tribal resources. Any planned developments would be required to complete their own independent environmental review and identify appropriate impacts and mitigations related to tribal

resources as well as complete tribal coordination. Therefore, the No Project Alternative would have a less than significant impact during construction related to tribal cultural resources.

#### OPERATION

**No Impact.** Under the No Project Alternative, a light rail line connecting the K, E, D, and B Lines would not be constructed. Although planned development in the area is likely to continue, potential impacts to cultural or paleontological resources are more likely to occur during the construction phase with demolition or ground-disturbing activities, as discussed above, rather than during operation. Therefore, the No Project Alternative would have no impact during operation related to tribal cultural resources.

### 5.5.2.17 UTILITIES AND SERVICE SYSTEMS

#### CONSTRUCTION

**Less than Significant Impact.** The No Project Alternative would not construct a light rail line connecting the K, E, D, and B Lines. However, construction activities associated with other planned developments in the region would occur that have the potential to increase demand for utilities. Other planned developments would be required to complete their own assessment of utility impacts and develop appropriate mitigation. Therefore, the No Project Alternative would have a less than significant impact during construction related to utilities and service systems.

#### OPERATION

**Less than Significant Impact.** The No Project Alternative would not operate a new light rail line connecting the K, E, D, and B Lines. However, the completion of other planned developments has the potential to increase demand for utilities. Other planned developments would be required to complete their own assessment of utility impacts and develop appropriate mitigation. Therefore, the No Project Alternative would have a less than significant impact during operation related to utilities and service systems.

### 5.5.3 HIGH FREQUENCY BUS ALTERNATIVE

The following sections discuss the construction and operational impacts of the HFB Alternative.

#### 5.5.3.1 AESTHETICS

#### CONSTRUCTION

**Less than Significant Impact.** Construction for the HFB Alternative would not require intensive activity that would affect scenic resources or state scenic highways, or conflict with local land use plans regarding scenic quality. Construction equipment, vehicles, signs, staging, and personnel would present temporary disruptive visual elements, but construction activities are temporary in nature. Construction activities are not anticipated to result in a substantial source of light or create glare. Therefore, the HFB Alternative would have a less than significant impact during construction related to aesthetics.

## OPERATION

**Less than Significant Impact.** Operation of HFB Alternative would involve additional buses running within the existing transportation network and would not impact scenic resources or state scenic highways, conflict with local land use plans regarding scenic quality, or create a source of glare. Therefore, the HFB Alternative would have a less than significant impact during operation related to aesthetics.

### 5.5.3.2 AIR QUALITY

#### CONSTRUCTION

**Less than Significant Impact.** Construction of the HFB Alternative would require minor changes to the roadway, such as restriping or curb extensions, which would require the use of a small number of construction vehicles. Truck haul trips would be minimal. Construction would occur for a short duration. Overall, construction would generate minimal pollutants and emissions and would not conflict with air quality plans. Therefore, the HFB Alternative would have a less than significant impact during construction related to air quality.

#### OPERATION

**Less than Significant Impact.** As part of its initiative to minimize the environmental consequences of its operations, Metro has committed to implementing a cleaner fleet of buses and service vehicles that reduce air pollutants. On July 27, 2017, the Metro Board unanimously voted to transition the entire Metro bus fleet to zero-emission vehicles by 2030. The HFB Alternative would not interfere with Metro's efforts to reduce its systemwide air pollutant emissions and would not conflict with implementation of the Air Quality Management Plan. Although this alternative is not an extension of the light rail line, it would nevertheless provide a new transit option providing VMT and air quality benefits. In this way, the alternative remains consistent with the 2020-2045 SCAG RTP/SCS, although to a lesser extent than the KNE Fairfax Alignment. Therefore, the HFB Alternative would have a less than significant impact during operation related to air quality.

### 5.5.3.3 BIOLOGICAL RESOURCES

#### CONSTRUCTION

**Less than Significant Impact.** Construction of the HFB Alternative would not require the removal of vegetation and would not result in a potential to impact any special-status species of plants or wildlife directly or indirectly. There would not be a potential to adversely affect riparian habitats and wetlands because construction activities would not be located near riparian habitats or wetlands. Construction of this alternative would not conflict with applicable local regulations protecting biological resources. Therefore, the HFB Alternative would have a less than significant impact during construction related to biological resources.

## OPERATION

**Less than Significant Impact.** Operation of the HFB Alternative would involve additional buses running within the existing transportation network, and the existing conditions would largely remain the same. There would not be a potential to impact any special-status species directly or indirectly. Therefore, the HFB Alternative would have a less than significant impact during operation related to biological resources.

### 5.5.3.4 COMMUNITIES, POPULATION, AND HOUSING

#### CONSTRUCTION

**Less than Significant Impact.** Construction of the HFB Alternative would not induce substantial unplanned population growth, either directly or indirectly. Construction activities would not require acquisition of residential parcels and therefore would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Therefore, the HFB Alternative would have a less than significant impact during construction related to communities, population, and housing.

#### OPERATION

**Less than Significant Impact.** Operation of the HFB Alternative would not induce substantial unplanned population growth, either directly or indirectly. Operation would not require acquisition of residential parcels, would not displace substantial numbers of existing people or housing, and would not necessitate construction of replacement housing elsewhere. Therefore, the HFB Alternative would have a less than significant impact during operation related to communities, population, and housing.

### 5.5.3.5 CULTURAL AND PALEONTOLOGICAL RESOURCES

#### CONSTRUCTION

**Less than Significant Impact.** Though historical resources have been identified within the alignment resource study area (RSA), construction activities associated with the HFB Alternative would not directly impact historical resources. Construction would not include property acquisitions or demolition of historical resources. Construction would not require excavation and there would not be a potential to result in a change in the significance of a unique archaeological resource or disturb any human remains. Additionally, construction would not directly or indirectly destroy a unique paleontological resource, site, or unique geologic feature. Therefore, HFB Alternative would have a less than significant impact during construction related to cultural and paleontological resources.

#### OPERATION

**Less than Significant Impact.** Operation of the HFB Alternative would not include ground-disturbing activities and would not have the potential to impact historical resources, result in a change in the significance of a unique archaeological resource, or disturb any human remains. Additionally, operation would not directly or indirectly destroy a unique paleontological resource, site, or unique geologic feature. Therefore, the HFB Alternative would have a less than significant impact during operation related to cultural and paleontological resources.

### 5.5.3.6 ENERGY

#### CONSTRUCTION

**Less than Significant Impact.** Construction of the HFB Alternative would primarily use diesel fuel for construction vehicles and equipment. Construction activities would be minimal, and would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Construction would not conflict with or obstruct state or local plans for renewable energy or energy efficiency. Therefore, the HFB Alternative would have a less than significant impact during construction related to energy.

#### OPERATION

**Less than Significant Impact.** Operation of the HFB Alternative would consume energy for the buses and would also indirectly change regional energy consumption through changes in regional VMT. There would not be a wasteful or inefficient use of energy resources. However, the reduction of VMT and associated regional transportation energy efficiency improvements with this alternative would be lower than for the KNE Fairfax Alignment due to lower anticipated ridership. Therefore, the HFB Alternative would have a less than significant impact during operation related to energy.

### 5.5.3.7 GEOLOGY AND SOILS

#### CONSTRUCTION

**Less than Significant Impact.** Construction for the HFB Alternative would not require excavation and therefore there would be no potential to result in impacts related to earthquake faults, soil erosion, unstable soils, or expansive soils. The alignment is located in a relatively flat, developed urban area and construction would not destroy, permanently cover, or adversely alter any unique or prominent geologic or topographic features. Therefore, the HFB Alternative would have a less than significant impact during construction related to geology and soils.

#### OPERATION

**Less than Significant Impact.** Operation of the HFB Alternative would involve additional buses running within the existing transportation network. The existing roadways are built to handle the loads of an operating transit bus and there would be no potential to result in impacts related to soil and seismic hazards. Additionally, there would be no subsurface disturbance during operation. Therefore, the HFB Alternative would have a less than significant impact during operation related to geology and soils.

### 5.5.3.8 GREENHOUSE GAS EMISSIONS

#### CONSTRUCTION

**Less than Significant Impact.** Construction of the HFB Alternative would require minor changes to the roadway, such as restriping or curb extensions, which would require the use of a small number of construction vehicles. Truck haul trips would be minimal. Construction would occur for a short duration. Overall, construction would generate very minimal emissions. Therefore, the HFB Alternative would have a less than significant impact during construction related to GHG emissions.

## OPERATION

**Less than Significant Impact.** As discussed in Section 5.5.3.2, Metro is transitioning the Metro bus fleet to zero-emission vehicles by 2030. The HFB Alternative would not generate substantial GHG emissions and would not conflict with applicable plans. Although this alternative is not an extension of the light rail line, it would nevertheless provide a new transit option. In this way, the alternative remains consistent with the 2020-2045 SCAG RTP/SCS, although to a lesser extent than the KNE Fairfax Alignment. Therefore, the HFB Alternative would have a less than significant impact during operation related to GHG emissions.

### 5.5.3.9 GROWTH INDUCING IMPACTS

#### CONSTRUCTION

**No Impact.** Construction activity associated with the HFB Alternative would draw construction workers from across the greater metropolitan area, though to a lesser extent than construction of LRT. These workers would commute to their work sites, and it is unlikely that people would move from their homes because of the temporary construction activity. Unanticipated population growth is not expected to result from construction nor is the construction activity likely to drive the existing station RSA population to relocate. Construction activity is unlikely to temporarily hinder economic development. Therefore, the HFB Alternative would have no impact during construction related to growth inducing impacts.

#### OPERATION

**No Impact.** Operation of the HFB Alternative is not expected to generate significant unanticipated employment or economic growth. Operation of this alternative would lead to improved mobility options for those living or working within the RSAs and, but it is unlikely that operation would spark unanticipated economic development or that the economic development would diminish environmental quality. Therefore, the HFB Alternative would have no impact during operation related to growth inducing impacts.

### 5.5.3.10 HAZARDS AND HAZARDOUS MATERIALS

#### CONSTRUCTION

**Less than Significant Impact.** Construction of the HFB Alternative would not include ground-disturbing activities, and the potential of encountering contaminated groundwater or soil would be low. Construction could temporarily increase the regional transport, use, and disposal of hazardous materials and petroleum products, such as fuels and paints, though to a lesser extent than construction of the KNE Fairfax Alignment. Construction would comply with existing federal, state, and local regulations pertaining to routine transport, use, or disposal of hazardous materials. There would not be any demolition of existing structures that could release hazardous materials, nor would there be impacts on potential Recognized Environmental Conditions. Therefore, the HFB Alternative would have a less than significant impact during construction related to hazards and hazardous materials.

## OPERATION

**Less than Significant Impact.** Operation of the HFB Alternative would involve additional buses running within the existing transportation network. There would not be any subsurface ground disturbance, and use of hazardous materials would be limited to typical materials associated with bus operation and maintenance. Therefore, the HFB Alternative would have a less than significant impact during operation related to hazards and hazardous materials.

### 5.5.3.11 HYDROLOGY AND WATER QUALITY

#### CONSTRUCTION

**Less than Significant Impact.** Construction of the HFB Alternative would require minor changes to the roadway, and there would not be any construction activities that could result in impacts to surface or groundwater resources. Any changes to curbs and gutters or existing drainage facilities would comply with all regulatory requirements and employ best management practices (BMPs) during construction and would not substantially alter drainage patterns. There are no rivers or streams within this alignment, and construction would not increase the rate or amount of surface runoff in a manner that would result in flooding or that would exceed the capacity of existing or planned stormwater drainage systems. Therefore, the HFB Alternative would have a less than significant impact during construction related to hydrology and water quality.

#### OPERATION

**Less than Significant Impact.** Operation of the HFB Alternative would not result in impacts to surface or groundwater resources. This alternative would be located within an existing roadway and would not result in a net increase in impervious surfaces. Any changes to curbs and gutters or existing drainage facilities would comply with all regulatory requirements and employ BMPs during construction and would not substantially alter drainage patterns. There are no rivers or streams within this alignment, and operation of buses would not increase the rate or amount of surface runoff in a manner that would result in flooding or that would exceed the capacity of existing or planned stormwater drainage systems. Therefore, the HFB Alternative would have a less than significant impact during operation related to hydrology and water quality.

### 5.5.3.12 LAND USE AND PLANNING

#### CONSTRUCTION

**Less than Significant Impact.** During construction, the HFB Alternative would primarily require physical changes to roadways through the City of Los Angeles. This could include temporary road closures shorter in duration than those associated with the KNE Fairfax Alignment. However, construction efforts would generally be limited to restriping and curb extensions, which do not typically last for more than a week in a single location and are localized and are thus unlikely to divide an established community or conflict with local plans and policies. Therefore, the HFB Alternative would have a less than significant impact during construction related to land use and planning.

## OPERATION

**Less than Significant Impact.** Operation of the HFB Alternative would not result in a physical division of a community. This alternative would provide a high-frequency transit line and is generally consistent with local plans' goals for circulation improvements, community access and development, and air pollutant emissions and GHG reductions, but would provide fewer circulation improvements and emission reductions than the KNE Fairfax Alignment. Therefore, the HFB Alternative would have a less than significant impact during operation related to land use and planning.

### 5.5.3.13 NOISE AND VIBRATION

## CONSTRUCTION

**Less than Significant Impact.** Construction for the HFB Alternative would not require intensive activity, and the equipment would be minimal compared to that required for the KNE Fairfax Alignment, likely including equipment such as paving machines and rollers. The alignment would be along major arterials and there would not be exceedances in ambient noise levels or vibration impacts. Therefore, the HFB Alternative would have a less than significant impact during construction related to noise and vibration.

## OPERATION

**No Impact.** Operation of the HFB Alternative would involve additional buses running within the existing transportation network and would not result in substantial increases in ambient noise levels or generation of vibration impacts that exceed thresholds. Therefore, the HFB Alternative would have a less than significant impact during operation related to noise and vibration.

### 5.5.3.14 PUBLIC SERVICES AND RECREATION

## CONSTRUCTION

**Less than Significant Impact.** Construction of the HFB Alternative would be located within the roadway, and would not directly impact schools, parks, recreational, or governmental facilities, or emergency services. Construction may require lanes closures, but it would be unlikely that the entire roadway would need to be closed, and access to public facilities would not be impacted. Construction would not include the construction of recreational facilities or require the expansion of existing recreational facilities. Therefore, the HFB Alternative would have a less than significant impact during construction related to public services and recreation.

## OPERATION

**Less than Significant Impact.** Operation of the HFB Alternative would involve additional buses running within the existing transportation network. Acquisition of public facilities would not be required and there would not otherwise be any direct impacts to public facilities. This alternative also would not induce unplanned population increases that would impact the demand for public facilities. The HFB Alternative is anticipated to be less effective than the KNE Fairfax Alignment in reducing growth of regional traffic congestion, which in turn could result in reduced emergency service response times. However, emergency service dispatch has real-time traffic conditions, so the potential for emergency service

response delay is small. Therefore, the HFB Alternative would have a less than significant impact during operation related to public services and recreation.

#### 5.5.3.15 TRANSPORTATION

##### CONSTRUCTION

**Less than Significant Impact.** Construction of the HFB Alternative would require minor changes to the roadway, such as restriping or curb extensions, which would affect circulation. However, the changes would not result an increase in hazards or result in inadequate emergency access. Construction of this alternative would not increase VMT. Therefore, the HFB Alternative would have a less than significant impact during construction related to transportation.

##### OPERATION

**Less than Significant Impact.** Operation of the HFB Alternative would involve additional buses running within the existing transportation network, which would not result in impacts related to VMT, circulation, or hazards. The KNE Fairfax Alignment is included within Metro’s Long Range Transportation Plan, and although the HFB Alternative is not an extension of the light rail line, it would nevertheless provide a transit option connecting the existing K, E, D, and B Lines, with stops along the way. In this way, this alternative would fulfill the intent of the applicable transportation plans, although to a lesser extent than the KNE Fairfax Alignment. Therefore, the HFB Alternative would have a less than significant impact during operation related to transportation.

#### 5.5.3.16 TRIBAL CULTURAL RESOURCES

##### CONSTRUCTION

**Less than Significant Impact.** Construction for the HFB Alternative would not require excavation and therefore there would not be a potential to result in impacts related to disturbing unknown tribal cultural resources (TCRs). Therefore, the HFB Alternative would have a less than significant impact during construction related to TCRs.

##### OPERATION

**No Impact.** Operation of the HFB Alternative would involve additional buses running within the existing transportation network and would not include ground-disturbing activities. There would not be a potential to disturb any buried TCRs, nor would it alter any existing setting that would impact a TCR. Therefore, the HFB Alternative would have no impact during operation related to TCRs.

#### 5.5.3.17 UTILITIES AND SERVICE SYSTEMS

##### CONSTRUCTION

**Less than Significant Impact.** Construction of the HFB Alternative would require minor changes to the roadway, and likely would not require any utility relocations or disruption of services. Construction activities would not substantially increase water usage or require the expansion of any existing

wastewater facilities. Therefore, the HFB Alternative would have a less than significant impact during construction related to utilities and service systems.

## OPERATION

**Less than Significant Impact.** Operation of the HFB Alternative would not result in a significant long-term, permanent source of water use, wastewater, or solid waste, and would not require coordination with third-party utility owners. In 2017, the Metro Board selected to transition the entire Metro bus fleet to zero-emission vehicles by 2030. This alternative would not substantially increase demand for natural gas and would not require the expansion of existing facilities. Therefore, the HFB Alternative would have a less than significant impact during operation related to utilities and service systems.

## 5.6 SUMMARY TABLE OF IMPACTS

Table 5-4 summarizes the level of impacts of the KNE Fairfax Alignment (proposed project), the No Project Alternative, and the HFB Alternative. For comparison, the table also includes the other two KNE light rail alignments (KNE San Vicente–Fairfax Alignment and KNE La Brea Alignment) evaluated in detail in Chapter 3. The No Project Alternative would not have significant and unavoidable impacts during construction. It would have significant and unavoidable impacts during operation for air quality, greenhouse gas emissions, land use and planning, and transportation. Although the HFB Alternative does not have the same VMT reduction, air quality improvements, GHG reductions, and energy savings benefits as the KNE Fairfax Alignment, this alternative would not result in significant and unavoidable impacts to environmental resources during construction or operation. The KNE Fairfax Alignment (proposed project), as well as the KNE San Vicente–Fairfax and KNE La Brea Alignments, would all result in significant and unavoidable impacts for cultural resources and paleontological resources during construction. The KNE light rail alignments do not have significant and unavoidable impacts during operation.

TABLE 5-4. COMPARISON OF IMPACT SIGNIFICANCE CONCLUSIONS

|                                            |              | RAIL ALIGNMENTS AND FACILITIES     |                                      |                                    |                                    |                  | NO TRANSIT                         | BUS TRANSIT                    |
|--------------------------------------------|--------------|------------------------------------|--------------------------------------|------------------------------------|------------------------------------|------------------|------------------------------------|--------------------------------|
|                                            |              | SAN VICENTE–FAIRFAX ALIGNMENT      | FAIRFAX ALIGNMENT (PROPOSED PROJECT) | LA BREA ALIGNMENT                  | HOLLYWOOD BOWL DESIGN OPTION       | MSF REQUIREMENTS | NO PROJECT ALTERNATIVE             | HIGH FREQUENCY BUS ALTERNATIVE |
| <b>Aesthetics</b>                          | Construction | LTS                                | LTS                                  | LTS                                | LTS                                | LTS              | LTS                                | LTS                            |
|                                            | Operation    | LTS                                | LTS                                  | LTS                                | LTS                                | LTS              | LTS                                | LTS                            |
| <b>Air Quality</b>                         | Construction | LTS                                | LTS                                  | LTS                                | LTS                                | LTS              | LTS                                | LTS                            |
|                                            | Operation    | LTS                                | LTS                                  | LTS                                | LTS                                | LTS              | <b>Significant and Unavoidable</b> | LTS                            |
| <b>Biological Resources</b>                | Construction | LTS                                | LTS                                  | LTS                                | LTS                                | LTS              | LTS                                | LTS                            |
|                                            | Operation    | LTS                                | LTS                                  | LTS                                | LTS                                | LTS              | No Impact                          | LTS                            |
| <b>Communities, Population and Housing</b> | Construction | LTS                                | LTS                                  | LTS                                | LTS                                | LTS              | LTS                                | LTS                            |
|                                            | Operation    | LTS                                | LTS                                  | LTS                                | LTS                                | LTS              | LTS                                | LTS                            |
| <b>Cultural Resources</b>                  | Construction | <b>Significant and Unavoidable</b> | <b>Significant and Unavoidable</b>   | <b>Significant and Unavoidable</b> | LTS                                | LTS              | LTS                                | LTS                            |
|                                            | Operation    | LTS                                | LTS                                  | LTS                                | LTS                                | No Impact        | No Impact                          | LTS                            |
| <b>Paleontological Resources</b>           | Construction | <b>Significant and Unavoidable</b> | <b>Significant and Unavoidable</b>   | <b>Significant and Unavoidable</b> | <b>Significant and Unavoidable</b> | LTS              | LTS                                | LTS                            |
|                                            | Operation    | No Impact                          | No Impact                            | No Impact                          | No Impact                          | No Impact        | No Impact                          | LTS                            |
| <b>Energy</b>                              | Construction | LTS                                | LTS                                  | LTS                                | LTS                                | LTS              | LTS                                | LTS                            |
|                                            | Operation    | LTS                                | LTS                                  | LTS                                | LTS                                | LTS              | LTS                                | LTS                            |
| <b>Geology and Soils</b>                   | Construction | LTS                                | LTS                                  | LTS                                | LTS                                | LTS              | LTS                                | LTS                            |
|                                            | Operation    | LTS                                | LTS                                  | LTS                                | LTS                                | LTS              | No Impact                          | LTS                            |
| <b>Greenhouse Gas Emissions</b>            | Construction | LTS                                | LTS                                  | LTS                                | LTS                                | LTS              | LTS                                | LTS                            |
|                                            | Operation    | LTS                                | LTS                                  | LTS                                | LTS                                | LTS              | <b>Significant and Unavoidable</b> | LTS                            |

|                                        |              | RAIL ALIGNMENTS AND FACILITIES |                                      |                   |                              |                  | NO TRANSIT                         | BUS TRANSIT                    |
|----------------------------------------|--------------|--------------------------------|--------------------------------------|-------------------|------------------------------|------------------|------------------------------------|--------------------------------|
|                                        |              | SAN VICENTE–FAIRFAX ALIGNMENT  | FAIRFAX ALIGNMENT (PROPOSED PROJECT) | LA BREA ALIGNMENT | HOLLYWOOD BOWL DESIGN OPTION | MSF REQUIREMENTS | NO PROJECT ALTERNATIVE             | HIGH FREQUENCY BUS ALTERNATIVE |
| <b>Growth Inducing Impacts</b>         | Construction | No Impact                      | No Impact                            | No Impact         | No Impact                    | No Impact        | No Impact                          | No Impact                      |
|                                        | Operation    | LTS                            | LTS                                  | LTS               | LTS                          | No Impact        | LTS                                | No Impact                      |
| <b>Hazards and Hazardous Materials</b> | Construction | LTS                            | LTS                                  | LTS               | LTS                          | LTS              | LTS                                | LTS                            |
|                                        | Operation    | LTS                            | LTS                                  | LTS               | LTS                          | LTS              | No Impact                          | LTS                            |
| <b>Hydrology and Water Quality</b>     | Construction | LTS                            | LTS                                  | LTS               | LTS                          | LTS              | LTS                                | LTS                            |
|                                        | Operation    | LTS                            | LTS                                  | LTS               | LTS                          | LTS              | LTS                                | LTS                            |
| <b>Land Use and Planning</b>           | Construction | LTS                            | LTS                                  | LTS               | LTS                          | LTS              | No Impact                          | LTS                            |
|                                        | Operation    | LTS                            | LTS                                  | LTS               | LTS                          | LTS              | <b>Significant and Unavoidable</b> | LTS                            |
| <b>Noise and Vibration</b>             | Construction | LTS                            | LTS                                  | LTS               | LTS                          | LTS              | LTS                                | LTS                            |
|                                        | Operation    | LTS                            | LTS                                  | LTS               | LTS                          | LTS              | LTS                                | No Impact                      |
| <b>Public Services and Recreation</b>  | Construction | LTS                            | LTS                                  | LTS               | LTS                          | LTS              | LTS                                | LTS                            |
|                                        | Operation    | LTS                            | LTS                                  | LTS               | LTS                          | LTS              | LTS                                | LTS                            |
| <b>Transportation</b>                  | Construction | LTS                            | LTS                                  | LTS               | LTS                          | LTS              | LTS                                | LTS                            |
|                                        | Operation    | LTS                            | LTS                                  | LTS               | LTS                          | LTS              | <b>Significant and Unavoidable</b> | LTS                            |
| <b>Tribal Cultural Resources</b>       | Construction | LTS                            | LTS                                  | LTS               | LTS                          | LTS              | LTS                                | LTS                            |
|                                        | Operation    | No Impact                      | No Impact                            | No Impact         | No Impact                    | No Impact        | No Impact                          | No Impact                      |
| <b>Utilities and Service Systems</b>   | Construction | LTS                            | LTS                                  | LTS               | LTS                          | LTS              | LTS                                | LTS                            |
|                                        | Operation    | LTS                            | LTS                                  | LTS               | LTS                          | LTS              | LTS                                | LTS                            |

Source: Connect Los Angeles Partners 2024

LTS = less than significant; MSF = maintenance and storage facility

Note 1: MSF is a required element of all rail alignments.

Note 2: The impact significance conclusions presented for the KNE San Vicente–Fairfax, Fairfax, and La Brea Alignments, the Hollywood Bowl Design Option, and MSF are summaries of the most conservative post-mitigation impact conclusions. Refer to Chapter 3 for all pre-mitigation impact conclusions and relevant mitigation measures for each environmental resource.

## 5.7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines Section 15126.6 (e)(2) requires that an “environmentally superior” alternative be identified. The environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts. If the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

As shown in Table 5-4, the No Project Alternative would avoid the construction impacts identified for the KNE Fairfax Alignment, but it would have significant and unavoidable impacts during operation related to air quality, greenhouse gas emissions, transportation, and land use and planning. The HFB Alternative would not result in significant construction or operational impacts as identified for the KNE Fairfax Alignment. The KNE San Vicente–Fairfax and KNE La Brea Alignments would result in similar significant construction and operational impacts as the KNE Fairfax Alignment. Therefore, the HFB Alternative is the environmentally superior alternative. However, the HFB Alternative would not realize the same level of benefits as a light rail extension from reduction in VMT, air quality improvements, GHG emissions reduction, and energy savings that would result from the KNE Fairfax Alignment, as well as the KNE San Vicente–Fairfax and KNE La Brea Alignments.

Following the completion of the public comment period on the Draft EIR, Metro staff will prepare a recommendation for the Metro Board to consider in the selection of a Locally Preferred Alternative (LPA) based on findings from the Draft EIR, public comments made during the comment period, technical analysis, stakeholder input, and other factors such as project objectives, cost, and ridership. The Metro Board will vote at a public meeting to select an LPA.