

## 5.0 ALTERNATIVES

California Environmental Quality Act (CEQA) requires that an environmental impact report (EIR) describe a reasonable range of alternatives to the project or to the location of the project that could feasibly avoid or lessen significant environmental impacts while substantially attaining the basic objectives of the project.<sup>1</sup> An EIR should also evaluate the comparative merits of the alternatives. This chapter sets forth potential alternatives to the proposed project and provides a qualitative analysis of each alternative and a comparison of each alternative to the proposed project. Key provisions of the CEQA Guidelines pertaining to the alternatives analysis are summarized below.<sup>2</sup>

- The discussion of alternatives shall focus on alternatives to the project including alternative locations that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.
- The No Project Alternative shall be evaluated along with its potential impacts. The No Project Alternative analysis shall discuss the existing conditions at the time the Notice of Preparation is published, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.
- The range of alternatives required in an EIR is governed by a "rule of reason." Therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the proposed project.
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.
- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.

The range of feasible alternatives is selected and discussed in a manner intended to foster meaningful public participation and informed decision making. Among the factors that may be taken into account when addressing the feasibility of alternatives (as described in CEQA Guidelines Section 15126.6[f][1]) 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 the alternative site.

An EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agency may make an initial determination as to which alternatives are feasible, and, therefore, merit in-depth consideration.<sup>3</sup> Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet project objectives, are infeasible, or do not avoid any significant environmental effects.<sup>4</sup>

### 5.1 PROJECT-LEVEL IMPACTS

As addressed in this EIR, the proposed project would create significant and unavoidable impacts associated with:

- **Transportation and Traffic (Intersections).** Implementation of Mitigation Measures **T1** through **T4** would potentially reduce congestion on impacted intersections; however, the degree to which signal optimization and transportation demand management would mitigate intersection congestion is uncertain at this time. Therefore, the proposed project's impacts to traffic circulation would remain potentially significant and unavoidable.

<sup>1</sup>CEQA Guidelines, California Code of Regulations (CCR), Title 14, Division 6, Chapter 3, Section 15126.6, 2005.

<sup>2</sup>Ibid.

<sup>3</sup>CEQA Guidelines, CCR, Title 14, Division 6, Chapter 3, Section 15126.6(f)(3), 2005.

<sup>4</sup>CEQA Guidelines, CCR, Title 14, Division 6, Chapter 3, Section 15126.6(c), 2005.

- **Noise and Vibration (Operational Noise).** The proposed project would result in a significant impact from the increased bus frequency on the Transit Enhanced Network. The increased frequency would increase noise levels greater than 3 dBA and there is no identified feasible mitigation, which would reduce the impact to less than significant.

As called for by the CEQA Guidelines, the achievement of project objectives must be balanced by the ability of an alternative to reduce the significant impacts of the project. The proposed project's objectives include:

### Proposed Projects' Objectives

The *Mobility Plan 2035* (MP 2035 or proposed project) addresses all modes of circulation on the City's street network, guiding mobility policies, programs, and projects in the City of Los Angeles through 2035. The six goals and corresponding policy topics of MP 2035 are as follows:

- **Safety First** – focuses on topics related to crashes, speed, protection, security, safety, education, and enforcement.
- **World Class Infrastructure** – focuses on topics related to the Complete Streets Network (walking, bicycling, transit, vehicles, green streets, goods movement), Great Streets, Bridges, Street Design Manual, and demand management.
- **Access for all Angelenos** – focuses on topics related to affordability, least cost transportation, land use, operations, reliability, demand management, and community connections.
- **Collaboration, Communication and Informed Choices** – focuses on topics related to real-time information, open source data, transparency, monitoring, reporting, emergency response, departmental and agency cooperation and data base management.
- **Clean Environments** – focuses on topics related to environment, health, clean air, clean fuels and fleets, and open street events.
- **Smart Investments** – focuses on topics related to fiscal responsibility, sustainable long-term funding, economic development, performance-based analysis and prioritization criteria.

Any evaluated alternative should meet as many project objectives as possible. In addition, while not specifically required under CEQA, other parameters may be used to further establish criteria for selecting alternatives such as adjustments to project phasing, conformance to all existing zoning requirements, and other "fine-tuning" that could shape feasible alternatives in a manner that may result in reducing identified environmental impacts. In some instances, when the project results in environmental impacts that are reduced to less-than-significant levels with mitigation, an alternative may reduce these less-than-significant impacts even further.

## 5.2 ALTERNATIVES TO THE PROPOSED PROJECT

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The CEQA statute, the CEQA Guidelines, and related recent court cases do not specify a precise number of alternatives to be evaluated in an EIR. Rather, "the range of alternatives required in an EIR is governed by the rule of reason that sets forth only those alternatives necessary to permit a reasoned choice."<sup>5</sup> At the same time, Section 15126.6(b) of the CEQA Guidelines requires that "...the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project" and Section 15126.6(f) requires, "The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project." Accordingly, alternatives that would not address potentially significant effects are not considered herein. However, the CEQA Guidelines require that a "No Project" alternative must be included and, if appropriate, an alternative

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<sup>5</sup>CEQA Guidelines, CCR, Title 14, Division 6, Chapter 3, Section 15126.6(f).

site location should be analyzed.<sup>6</sup> Other project alternatives may involve a modification of the proposed land uses, density, or other project elements at the same project location.

Alternatives should be selected on the basis of their ability to attain all or most of the basic objectives of the project while reducing the project's significant environmental effects. The CEQA Guidelines state that "...[t]he EIR should briefly describe the rationale for selecting alternatives to be discussed [and]...shall include sufficient information to allow meaningful evaluation, analysis and comparison with the proposed project."<sup>7</sup> The feasibility of the alternatives is another consideration in the selection of alternatives. The CEQA Guidelines state that "[a]mong the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations [and] jurisdictional boundaries..."<sup>8</sup> "The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making."<sup>9</sup> Alternatives that are considered remote or speculative, or whose effects cannot be reasonably predicted do not require consideration. Therefore, feasibility, the potential to mitigate significant project-related impacts, and reasonably informing the decision-maker are the primary considerations in the selection and evaluation of alternatives.

Alternatives considered for the proposed project were limited (as for the project) to the envelope of the existing public right-of-ways as alternatives that extended into private property would be infeasible or require substantial displacement to provide a uniform mobility improvement, such as an additional lane of travel or wider sidewalks, that would result in significant and unavoidable impacts. Unless the City of Los Angeles opted to invoke the power of eminent domain, the acquisition of private properties would occur through voluntary negotiations. The successful implementation of all property acquisition negotiations cannot be reasonably foreseen and the failure of a single acquisition of property could negate the proposed improvements and render the other acquisitions moot. Therefore, the range of alternatives considered for the proposed project was limited to improvements located within the existing public rights-of-way.

The mobility improvements considered as part of the project alternatives were separated by mode (vehicle, pedestrian, bicycle, transit) with goals provided for each mode. These performance goals represent the most efficient measures to create complete streets that improve performance on a multi-modal scale. These improvements were focused on priority corridors that were developed with public input, and represent the greatest opportunities to improve mobility. The evolution of these improvements represents a meaningful screening of alternatives, where the improvements that satisfied modal objectives and provided the greatest increases in mobility were carried forward. An updated version of the City of Los Angeles Travel Demand Model was used to evaluate mobility improvements. The model simulates existing conditions and forecasts future year conditions for the network, with and without the effects of the project, allowing for evaluation of a range of automobile and transit performance measures.

Given that the project is comprised of numerous improvements throughout the City of Los Angeles, it is not reasonable to separately evaluate alternatives to each proposed improvement or corridor. Rather MP 2035 is evaluated as a package of improvements. The proposed project represents the high end of the range of improvements (most change compared to existing) with the most comprehensive package of enhancements with the most intervention to the roadway system.

On the lowest end of the alternative range of mobility improvements (least amount of change from existing conditions) is the No Project Alternative that represents reasonably foreseeable development if MP 2035 was not implemented. The second alternative considered in the EIR represents the middle of the alternative range (medium level of change from existing) that evaluates a set of moderate mobility improvements representing a relatively low level of intervention to the roadway system.

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<sup>6</sup>CEQA Guidelines, CCR, Title 14, Division 6, Chapter 3, Section 15126.6(e) and Section 15126(f)(2).

<sup>7</sup>CEQA Guidelines, CCR, Title 14, Division 6, Chapter 3, Section 15126.6(e) and Section 15126(f).

<sup>8</sup>CEQA Guidelines, CCR, Title 14, Division 6, Chapter 3, Section 15126.6(f)(1).

<sup>9</sup>CEQA Guidelines, CCR, Title 14, Division 6, Chapter 3, Section 15126.6(f).

**Alternative 1 - No Project Alternative.** The No Project Alternative is required by Section 15126.6 (e)(2) of the CEQA Guidelines and assumes that the proposed project would not be implemented. The No Project Alternative allows decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The No Project Alternative includes “what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services” (CEQA Section 15126.6 [e][2]).

The City of Los Angeles’ Travel Demand Model was used to create the future baseline environment that represents the No Project Alternative.<sup>10</sup> The model has a base year of 2008, which is still reflective of existing conditions and a future year of 2035 and was designed to characterize peak period vehicle and transit flows on roadways within the study area based on comprehensive land use and socio-economic data (SED). The SED reflect the most recent Southern California Association of Governments (SCAG) 2012-2035 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) Model data for existing and future conditions. The model future year network includes projects expected to be implemented by year 2035 from the following sources:<sup>11</sup>

- The Los Angeles County Metropolitan Transportation Authority (Metro) Congestion Mitigation Fee project list;
- The Metro 2013 Call For Projects;
- The Street and Transportation Projects Oversight Committee project list; and
- The SCAG’s RTP/SCS (financially constrained) Model.

The consolidated list of projects that have been incorporated into the Future No Project network is provided in the traffic appendix (Appendix C).

**Alternative 2 – Moderate Package of Enhancements.** Alternative 2 includes the same land use assumptions as for the Project and No Project analyses. In order to analyze impacts, the network assumptions for Future No Project were modified to incorporate improvements associated with Alternative 2. These assumptions were less comprehensive than those assumed for the proposed project alternative to offer a lower cost alternative with potentially fewer impacts due to the extent of the changes. **Figure 5-1** shows the Pedestrian Enhanced Districts, **Figure 5-2** shows the Bicycle Enhanced Network, **Figure 5-3** shows the Transit Enhanced Network, and **Figure 5-4** shows the Vehicle Enhanced Network for Alternative 2. **Table 5-1** summarizes the comparison of impacts between the alternatives and proposed project and **Table 5-2** compares daily vehicle miles of travel under the alternatives and the proposed project.

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<sup>10</sup>The model utilizes the TransCAD Version 4.8 Build 500 modeling software and has been calibrated and validated for current conditions.

<sup>11</sup>The Los Angeles County Metropolitan Transportation Authority (Metro) Congestion Mitigation Fee program is on hold; projects from the CMP project list are currently included in the assumed future conditions as they reflect projects that have been identified through various City planning efforts.

# LOS ANGELES MOBILITY ELEMENT

## Alternative 2 Pedestrian Enhanced Districts

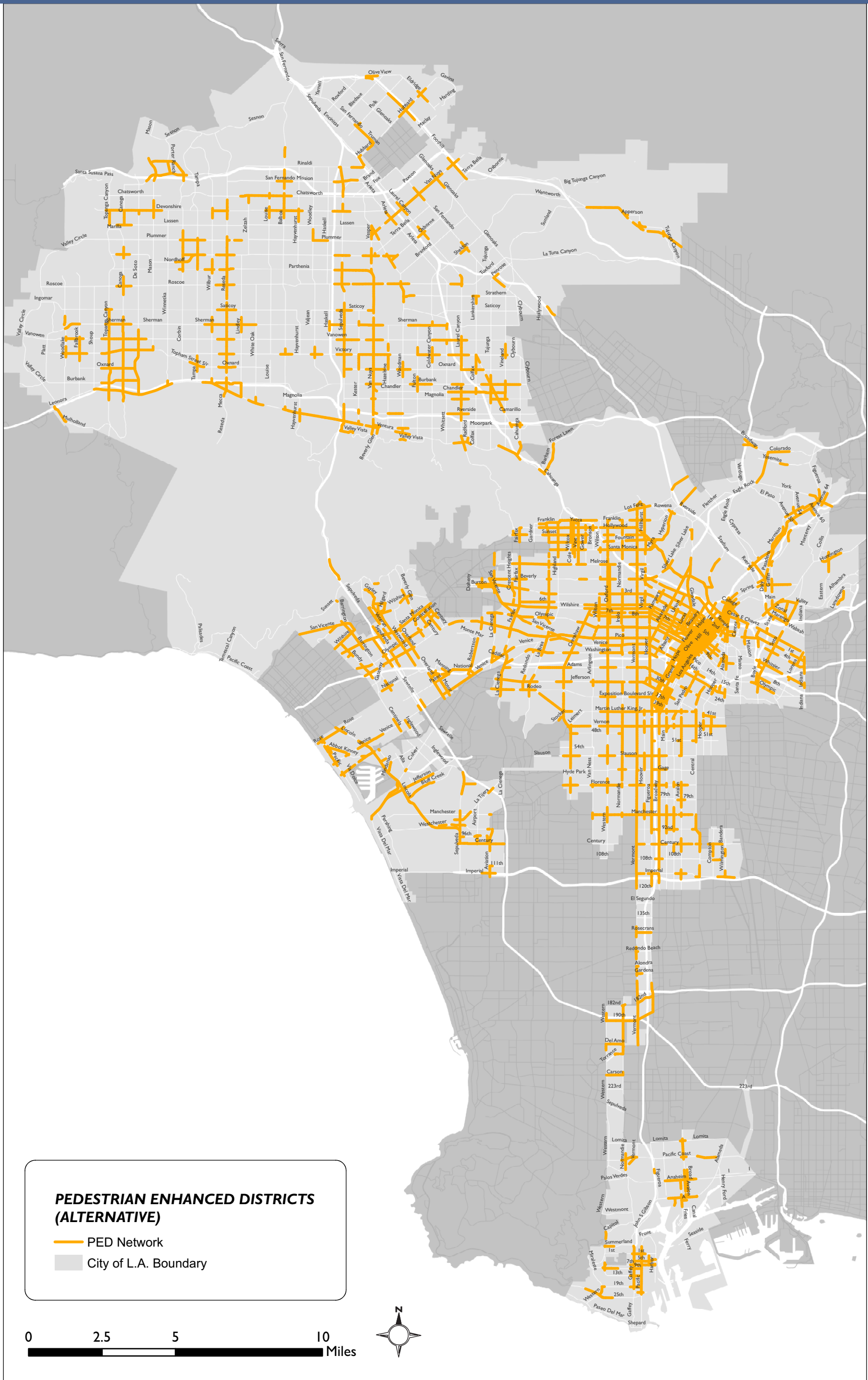


FIGURE 5-1

Source: Fehr & Peers, 2013.

# LOS ANGELES MOBILITY ELEMENT

## Alternative 2 Bicycle Enhanced Network

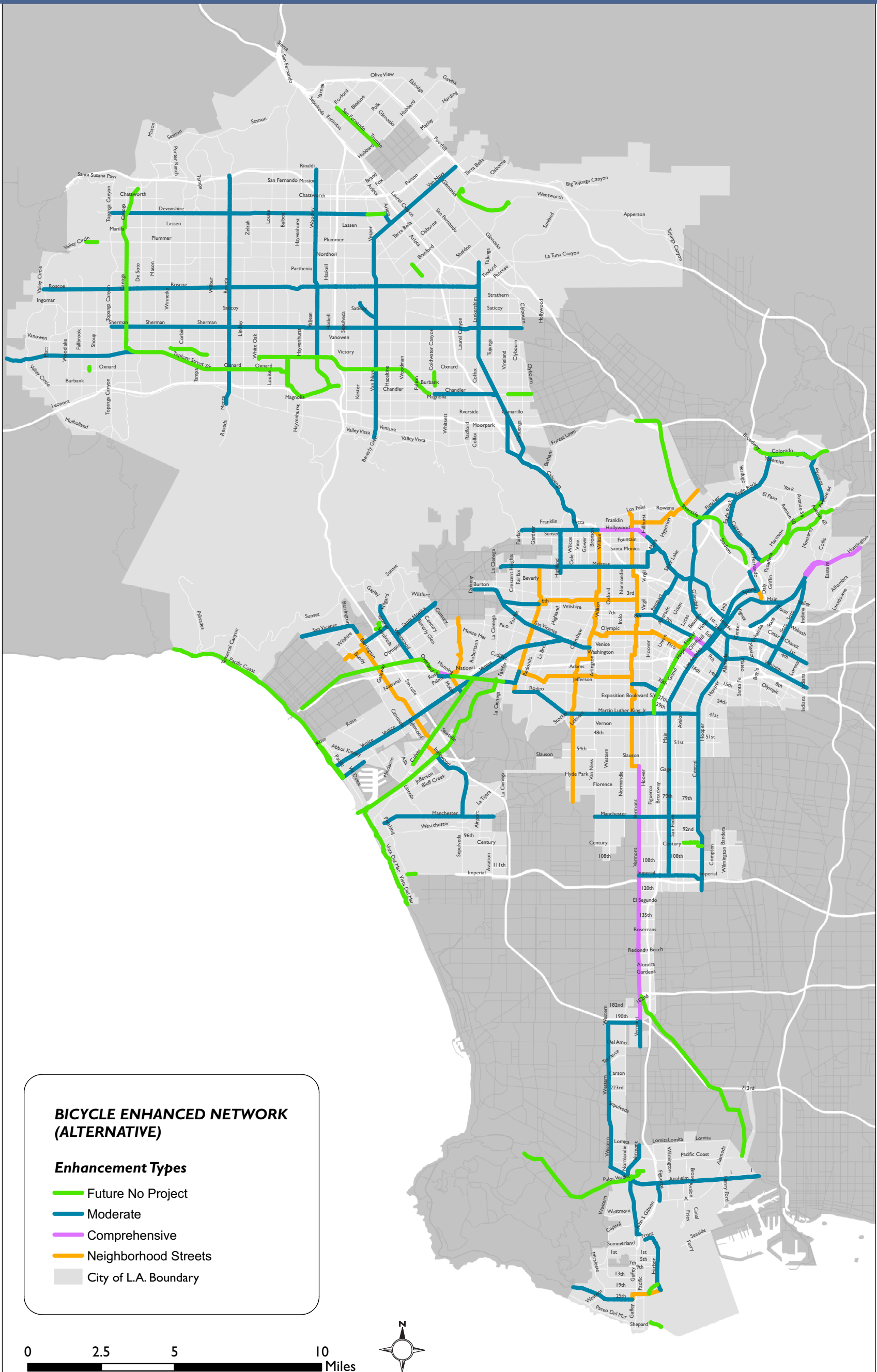


FIGURE 5-2

Source: Fehr & Peers, 2013.

# LOS ANGELES MOBILITY ELEMENT

## Alternative 2 Transit Enhanced Network

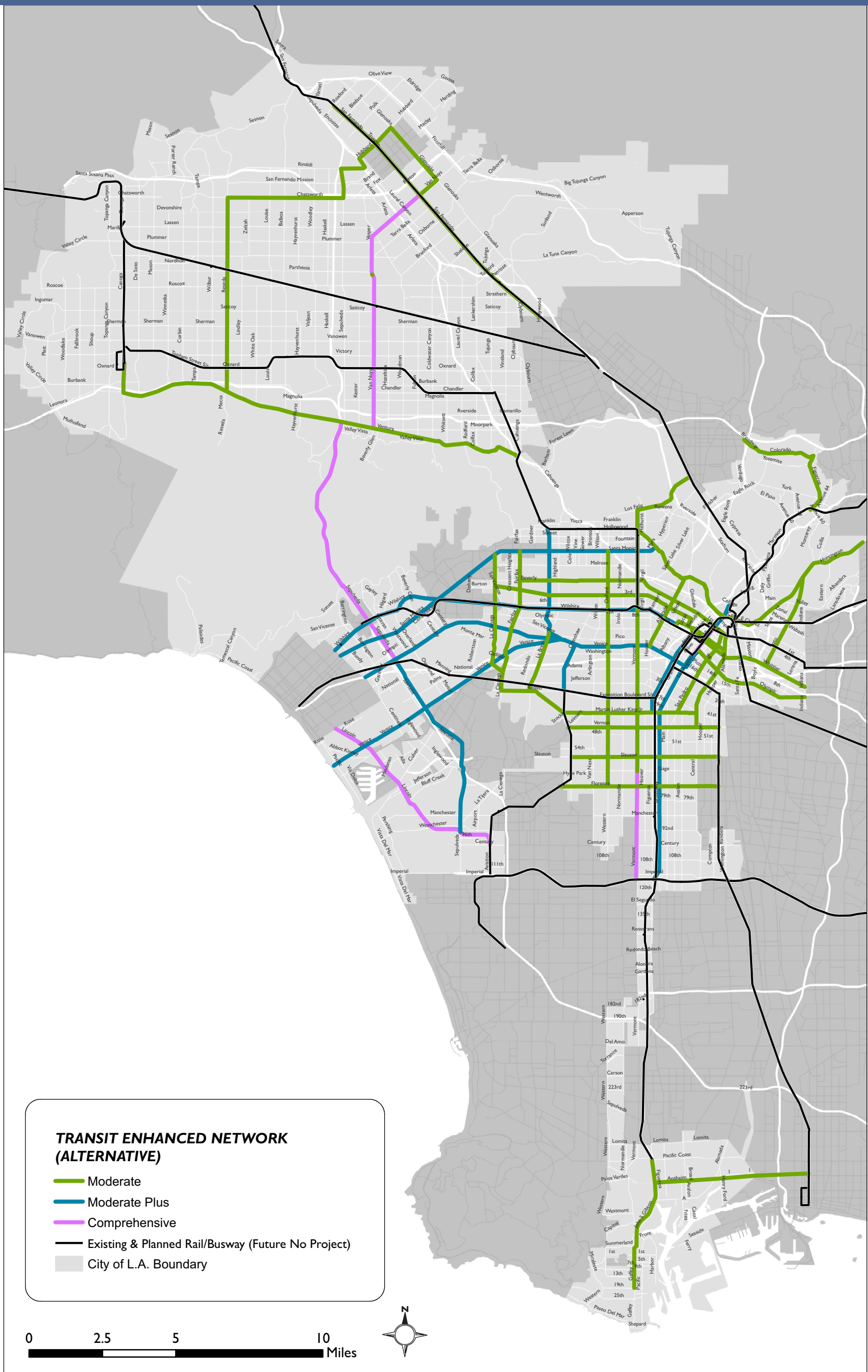


FIGURE 5-3

# LOS ANGELES MOBILITY ELEMENT

## Alternative 2 Vehicle Enhanced Network

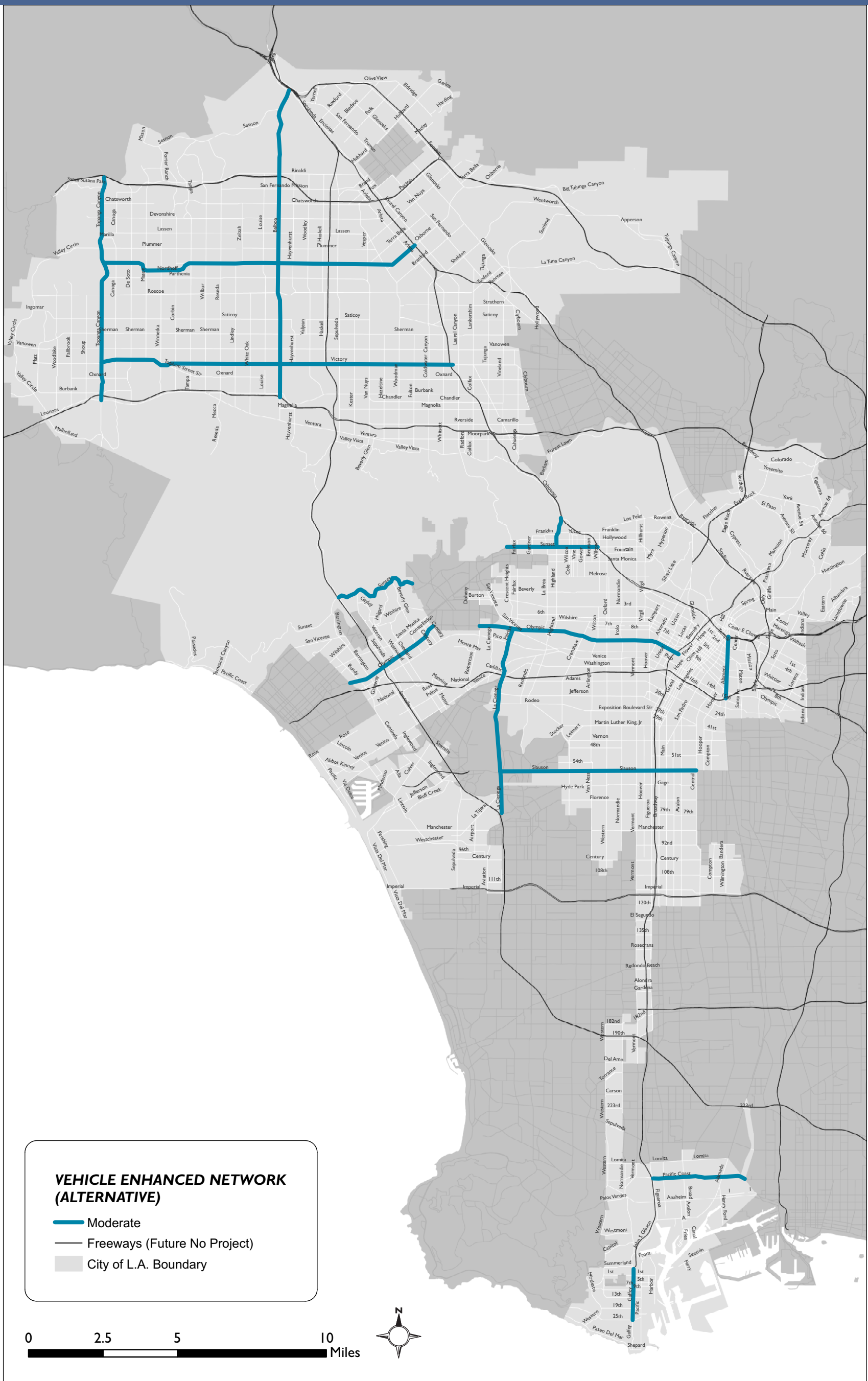


FIGURE 5-4

Source: Fehr & Peers, 2013.



<b>TABLE 5-1: COMPARISON OF IMPACTS -- PROJECT AND ALTERNATIVES</b>			
<b>Environmental Issue</b>	<b>Project -- Comprehensive Package of Improvements</b>	<b>Alternative 1 No Project Alternative</b>	<b>Alternative 2 Moderate Package of Enhancements</b>
<b>TRANSPORTATION, PARKING, AND SAFETY</b>			
Circulation System (Roadway)	<b>Significant</b>	<b>Significant (more vehicle miles traveled than project; fewer street segment LOS impacts than project)</b>	<b>Significant (more vehicle miles traveled than project; fewer street segment LOS impacts than project)</b>
Congestion Management Program	<b>Significant</b>	<b>Significant (same freeway segment impact as project)</b>	<b>Significant (same freeway segment impact as project)</b>
Emergency Access	No Impact	No Impact (similar to project)	No Impact (similar to project)
Public Transit, Bicycle, or Pedestrian Facilities	No Impact	No Impact (less mobility than the project and Alternative 2)	No Impact (less mobility than project)
Parking	Less than Significant	No Impact (no parking loss)	Less than Significant (parking loss similar to project)
Safety	No Impact	No Impact (less pedestrian, bicycle safety than project)	No Impact (similar to project)
<b>LAND USE &amp; PLANNING</b>			
Consistency with Applicable Plans and Policies	Less than Significant	<b>Significant</b>	Less than Significant (similar to project)
Land Use Compatibility	Less than Significant	No Impact	Less than Significant (similar to project)
<b>AIR QUALITY AND GREENHOUSE GASES</b>			
Regional	Less than Significant	Less than Significant (more emissions than project and Alternative 2)	Less than Significant (more emissions than project)
Localized	Less than Significant	Less than Significant (similar to project)	Less than Significant (similar to project)
Toxic Air Contaminants	Less than Significant	No Impact	Less than Significant (similar to project)
Odors	Less than Significant	No Impact	Less than Significant (similar to project)
Greenhouse Gas Emissions	Less than Significant	Less than Significant (more emissions than project and Alternative 2)	Less than Significant (more emissions than project)
<b>NOISE &amp; VIBRATION</b>			
Noise	<b>Significant</b>	Less than Significant (less than project)	<b>Significant Impact (less bus frequency than project)</b>
Groundborne Vibration	Less than Significant	No Impact (less than project)	Less than Significant (similar to project)
<b>SOURCE: TAHA, 2013.</b>			

<b>TABLE 5-2: VEHICLE MILES TRAVELED IN THE CITY OF LOS ANGELES</b>				
	<b>Existing Conditions</b>	<b>Project</b>	<b>Alternative 1 (No Project)</b>	<b>Alternative 2</b>
<b>Daily Vehicle Miles Traveled</b>				
Surface Streets	35,408,900	36,625,900	38,463,700	36,794,000
Freeways (Mainline)	39,857,400	44,329,500	44,164,000	44,449,200
<b>Total, City of Los Angeles</b>	<b>75,266,300</b>	<b>80,955,400</b>	<b>82,627,700</b>	<b>81,243,200</b>
<b>Percent Change vs. Proposed Project</b>				
Surface Streets	-3.3%	0.0%	5.0%	0.5%
Freeways (Mainline)	-10.1%	0.0%	-0.4%	0.3%
<b>Total, City of Los Angeles</b>	<b>-7.0%</b>	<b>0.0%</b>	<b>2.1%</b>	<b>0.4%</b>
<b>Percent Change vs. Existing Conditions</b>				
Surface Streets	0.0%	3.4%	8.6%	3.9%
Freeways (Mainline)	0.0%	11.2%	10.8%	11.5%
<b>Total, City of Los Angeles</b>	<b>0.0%</b>	<b>7.6%</b>	<b>9.8%</b>	<b>7.9%</b>
<b>SOURCE:</b> City of Los Angeles Travel Demand Model, 2013.				

## ANALYSIS OF ALTERNATIVE 1 – NO PROJECT ALTERNATIVE

### Transportation, Parking, and Safety

If the project improvements were not implemented, transportation network conditions would remain in their current condition for a time but would deteriorate as cumulative development increases. Without multi-modal improvements, mode shifts to pedestrian, bicycle, and transit would not occur as rapidly, and streets could become increasingly congested – possibly more in the long term than would occur with implementation of the project.

Collectively, daily vehicle miles of travel under Alternative 1 would increase approximately 10 percent over existing conditions and 2 percent when compared to the proposed project. A significant impact would occur related to the vehicular transportation network.

Under Alternative 1, planned transit, bicycle and pedestrian improvements would occur which would incrementally increase the multi-modal mobility in the study area. Therefore, no impact would occur related to the pedestrian, bicycle, and transit system.

No significant changes to lane configurations which would require the removal of parking would occur under the No Project Alternative. Therefore, no significant impacts would occur related to parking.

Safety conditions under Alternative 1 would be largely the same as it is now, unless changes are proposed as part of a separate project. Alternative 1 would not have detrimental effects on the safety of bicycle or pedestrian, or transit patrons. Therefore, no significant impacts would occur related to safety.

### Land Use and Planning

Under Alternative 1, existing conditions of the study area would not change. Specifically, no changes to the existing transportation infrastructure would occur which would be incompatible with land uses in the study area. Therefore, no impacts would occur related to land use compatibility.

Transportation improvements under the No Project Alternative would address vehicular circulation, and bicycle improvements. However, the planned improvements would be incremental and would not be consistent with regional and local policies related to complete streets and increased multi-modal mobility. Overall, the No Project Alternative would be inconsistent with the applicable plans and policies related to mobility. Therefore, a significant impact would occur related to consistency with applicable plans and policies.

### **Air Quality and Greenhouse Gas Emissions**

Alternative 1 would increase the vehicle miles traveled (VMT) compared to existing conditions and the proposed project which would result in higher criteria pollutant emissions from mobile sources. However, mobile and stationary source emissions would not exceed South Coast Air Quality Management District (SCAQMD) regional or localized thresholds. While Alternative 1 would result in higher in VMT compared to the proposed project, Alternative 1 would result in a less-than-significant impact related to air quality.

While Alternative 1 would increase the VMT compared to existing conditions, the total greenhouse gas (GHG) emissions from mobile sources would be reduced from existing conditions due to changes in fuel requirements and emission factors. However, Alternative 1 would result in a lower reduction in GHG emissions compared to the proposed project. While Alternative 1 would result higher in GHG emissions compared to the proposed project, Alternative 1 would result in a less-than-significant impact related to GHG emissions.

### **Noise and Vibration**

Under Alternative 1, planned improvements would generate additional noise and vibration levels when compared to existing conditions. These noise levels would generally occur during construction, would be temporary in duration and would not be significant. An incremental increase in operational noise or vibration levels would occur from the approximately 10 percent increase in vehicle miles traveled compared to existing conditions and 2 percent increase when compared to the proposed project. However, these vehicle miles would be dispersed over a large area and would not be concentrated enough to produce traffic volumes that would result in a perceptible increase in noise and vibration levels. . Therefore, Alternative 1 would result in less-than-significant impacts related to noise and vibration levels.

## **ANALYSIS OF ALTERNATIVE 2 – MODERATE PACKAGE OF IMPROVEMENTS**

In general, the proposed project represents the most comprehensive set of mobility improvements to the roadway network with the most intervention. Alternative 2 reflects an alternative with less comprehensive mobility improvements that would, in turn, result in generally fewer environmental (traffic) impacts. The proposed project would result in increased benefits related to multi-modal mobility and consistency with adopted plans and policies; it would also result in increased congestion. Alternative 2 would result in less intervention and less congestion but fewer multi-modal benefits.

In the long run, it is anticipated that a more robust multi-modal network as would occur under the proposed project, could be more beneficial to the City as mode shift choices continue to evolve, i.e. as more people choose alternative modes to vehicles, greater choice would be provided by the proposed project (as compared to Alternative 2) because alternative modes (transit, bicycles and pedestrian) would have more interconnected networks potentially accelerating mode shifts to modes other than vehicles. Alternative 2 would not provide the same potential for change as the proposed project.

### **Transportation, Parking, and Safety**

Daily vehicle miles of travel under Alternative 2 would be slightly greater than the proposed project. Alternative 2 VMT would increase approximately 8 percent over existing conditions. The VMT related to Alternative 2 would be approximately 0.4 percent greater than the VMT for the proposed project. Similar to the proposed project, Alternative 2 would result in a significant impact related to congestion and the vehicular transportation network.

The planned transit, bicycle and pedestrian improvements to the enhanced networks under Alternative 2 would increase the multi-modal mobility in the study area. Therefore, a less-than-significant impact would occur related to the pedestrian, bicycle, and transit system.

Changes to lane configurations requiring removal of parking lanes would not occur to the same extent under Alternative 2 as compared to the project. Therefore, impacts to parking would be less.

Safety conditions under Alternative 2 would be enhanced as compared to the No Project Alternative and Existing conditions with the proposed improvements that create more defined networks that decrease the potential for pedestrian, bicycle, and transit conflicts with the vehicular system. These improvements would not be as comprehensive as the proposed project and would not improve safety conditions to the same level as the proposed project. Therefore, no significant impacts would occur related to safety.

### **Land Use**

As for the project, Alternative 2 would be limited to the existing public right-of-way, would continue to be transportation related, and would not alter the existing land use compatibility in the study area. Therefore, no impact would occur related to land use compatibility.

The mobility improvements under Alternative 2 would not be as comprehensive as the proposed project and would not achieve the same level of project objectives and multi-modal mobility improvements as the proposed project. However, the mobility improvements under Alternative 2 would be consistent with regional and local adopted plans and policies. Therefore, Alternative 2 would result in a less-than-significant impact related to consistency with applicable plans and policies.

### **Air Quality**

Alternative 2 would have increased VMT compared to existing conditions and would decrease VMT compared to Alternative 1 (No Project) due to increased transit ridership and less comprehensive mobility improvements. The VMT related to Alternative 2 would be 0.35 percent greater than the VMT for the proposed project. Criteria pollutant and TAC emissions are directly related to VMT. The criteria pollutant emissions presented for the proposed project would be approximately 0.35 percent greater than emissions presented for the proposed project. Regional emissions associated with proposed project were well below the SCAQMD significance thresholds, and adding 0.35 percent more emissions would not cause the thresholds to be exceeded. Therefore, Alternative 2 would result in a less-than-significant impact related to air quality.

### **Greenhouse Gas Emissions**

Alternative 2 would have increased VMT compared to existing conditions and would decrease VMT compared to Alternative 1 (No Project) due to increased transit ridership and less comprehensive mobility improvements. The VMT related to Alternative 2 would be 0.35 percent greater than the VMT for the proposed project. Greenhouse gas emissions are directly related to VMT. The criteria pollutant emissions presented for the proposed project would be approximately 0.35 percent greater than emissions presented for the proposed project. Regional emissions associated with proposed project were well below the SCAQMD regional significance thresholds, and adding 0.35 percent more emissions would not cause the thresholds to be exceeded. Therefore, Alternative 2 would result in a less-than-significant impact related to GHG emissions.

### **Noise and Vibration**

Under Alternative 2, the predicted noise and vibration levels at adjacent sensitive land uses could be slightly greater than the proposed project as Alternative 2 would result in slightly higher vehicle speeds due to less congestion. However, the noise and vibration from the increase in vehicle speeds would be offset by the reduction of bus frequency under Alternative 2, which has a greater effect on noise and vibration levels. The lower bus frequency would result in lower noise and vibration levels compared to the proposed project. The lower noise and vibration levels would result in less-than-significant impacts.

## **ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

Section 15126.6 of the State CEQA Guidelines requires that an “environmentally superior” alternative be selected among the alternatives that are evaluated in the EIR. In general, the environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts. If the No Project

alternative is identified as environmentally superior, then another environmentally superior alternative shall be identified among the other alternatives.

As described in this chapter, similar to the proposed project, the alternatives would result in environmental impacts related to increased traffic (attributable to growth that is anticipated to occur with or without the project). Alternative 1, the No Project Alternative, would result in significant impacts to vehicular transportation network and land use policy consistency. Alternative 2 would result in significant impacts to the vehicular transportation network. In most cases, impacts would be similar to those anticipated to occur under the proposed project. See **Table 5-1**, above, for a comparison of impacts. Although impacts anticipated under Alternative 2 would be similar to the proposed project, it would result in an incrementally lower level of effect due to the lower intensity of physical changes to the enhanced networks. Therefore, Alternative 2 is considered to be the environmentally superior alternative due to a lower level of environmental impacts.

However, the proposed project would achieve more multi-modal mobility improvements and, in the long run, it is anticipated that a more robust multi-modal network as would occur under the proposed project, could be more beneficial to the City as mode shift choices continue to evolve, i.e. as more people choose alternative modes to vehicles, greater choice would be provided by the proposed project (as compared to Alternative 2) because alternative modes (transit, bicycles and pedestrian) would have more interconnected networks potentially accelerating mode shifts to modes other than vehicles.