CHAPTER 6
ALTERNATIVES

6.1 Introduction

Section 15126.6 of the State CEQA Guidelines requires an EIR to 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 comparable merits of the alternatives." The analysis of alternatives shall focus on alternatives "which 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 project objectives, or would be more costly."

The selection and discussion of alternatives is intended to foster public participation and informed decision making. An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and/or speculative. The State CEQA Guidelines further require the analysis of a No Project Alternative, and the identification of the Environmentally Superior Alternative. Where the Environmentally Superior Alternative is the No Project Alternative, the EIR shall also identify an Environmentally Superior Alternative among the other alternatives.

In addition, Section 15126.6 of the State CEQA Guidelines requires an EIR to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination.

Accordingly, several alternatives to the Proposed Project were considered, and five alternatives were selected for further analysis, as detailed below.

Case law suggests that the discussion of alternatives need not be exhaustive and that alternatives be subject to a construction of reasonableness. The impacts of the alternatives may be discussed in less detail than the environmental effects of the Proposed Project.

6.2 Project-Level Impacts

As identified in Chapter 4, *Environmental Impacts*, and Section 5.4, *Significant Environmental Effects that Cannot be Avoided if the Proposed Project is Implemented*, of this EIR, implementation of the Proposed Project would result in the following significant and unavoidable impacts:

- **Air Quality:**
  - Localized construction impacts (localized and temporary) from construction of transportation improvements
    - Exceedance of standards for inhalable particulate matter with diameter of ten microns or less (PM10) and fine particulate matter with diameter of 2.5 microns or less (PM2.5) by the Lincoln Boulevard Bridge Enhancement, and standards for PM10 by the Lincoln Boulevard and Sepulveda Boulevard Bus Rapid Transit (BRTs) and the Interstate-1 (I-10) Ramp Reconfiguration at Bundy Drive

        - Cumulative pollutant emissions impacts (PM10 and PM2.5)

- **Noise and Vibration:**
    - Construction impacts (localized and temporary) from construction of transportation improvements
        - Exceedance of established noise standards
        - Temporary or periodic increases in ambient noise levels
        - Groundborne vibrations
        - Cumulative impacts from exceedance of established noise standards and groundborne vibrations
    - Operational impacts (permanent) from curb-running bus operations
        - Exceedance of established noise standards
        - Permanent increase in ambient noise levels
        - Cumulative impacts from exceedance of noise standards and permanent increase in ambient noise levels
- **Transportation:**
    - Construction impacts (localized and temporary) from construction of transportation improvements
        - Traffic Impacts
        - Cumulative traffic impacts
    - Operational impacts (permanent)
        - Circulation system from vehicle traffic (based on current thresholds)
        - Neighborhood traffic intrusion
        - CMP and state freeway segments
        - Cumulative impacts related to vehicular traffic, neighborhood traffic intrusion, and Congestion Management Program (CMP) freeway segments

6.3 Project Objectives

The core or fundamental objectives of the transportation improvements that would be funded by the proposed amendments to the Specific Plans are to improve transportation options for multimodal travel on the Westside, reduce vehicle miles traveled, and reduce greenhouse gas emissions. These objectives, as well as additional primary and secondary objectives of the transportation improvements and overall Specific Plan amendments, are articulated below.

Primary Objectives of the Transportation Improvements:

- Provide transportation options and accommodations for multiple modes of travel (i.e., transit, bicycle, pedestrian, vehicle), within existing available right-of-way (right-of-way), as part of a transportation system that is consistent with the City of Los Angeles' General Plan Framework Element and General Plan Mobility Element; Community Plans for the Westwood, Brentwood-Pacific Palisades, West Los Angeles, Palms-Mar Vista-Del Rey, Venice, and Westchester-Playa Del Rey communities; and the Los Angeles International Airport (LAX) Specific Plan.
- Produce fewer auto trips per capita and decrease vehicle miles traveled (VMT) per capita by increasing multimodal transportation options and promoting best practices in transportation demand management.
- Reduce greenhouse gas emissions, as mandated by Assembly Bill (AB) 32 and Senate Bill (SB) 375, by reducing automobile dependence and offering multiple modes of transportation.
- Enhance mobility along key Westside transportation corridors within the Specific Plan areas, particularly by planning for dedicated transit lines that serve north-south corridors and provide connections to planned east-west transit lines.
- Enhance the transportation system by planning for better regional transit connectivity and "first mile-last mile" solutions (such as better pedestrian conditions, bike share/improved bicycle facilities, and circulator bus service).
- Encourage walking and bicycling as a means to safely and conveniently access transit and circulate within and between neighborhoods.
- Develop a multimodal transportation plan for the Westside that reflects the collective input of Westside community members, as gathered through a formal public outreach process.
- Develop transportation improvements that reflect consultation with multiple neighboring jurisdictions, transit service providers, and transportation planning agencies on the Westside.
- Develop a transportation system on the Westside that is efficient, sustainable, feasible, and fiscally responsible.

Secondary Objectives of the Transportation Improvements:

- Enhance the streetscape environment on portions of major arterials by improving neighborhood aesthetics and identity; implementing sustainable landscaping practices; bolstering local business patronage; and providing a pleasant and safe active transportation experience.
- Identify different types of parking strategies, such as demand-based pricing schemes, capacity management, travel demand management programs, and urban design guidelines, to manage parking supply.

The objectives of the proposed amendments to the Specific Plans include the following:

Primary Objectives of the Specific Plan Amendments:

- Develop amendments to the Coastal Transportation Corridor Specific Plan (CTCSP) and West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP)that are aligned with city and state policies concerning transportation, including the City of Los Angeles' General Plan Framework Element, General Plan Mobility Element, Los Angeles Department of Transportation (LADOT) Traffic Study Policies and Procedures, and State legislation (including AB 3005 and SB 743) that reprioritize transportation improvements to focus on access to transit and active transportation as strategies to reduce dependence on vehicular travel, and reduce VMT and associated greenhouse gas emissions.
- Develop amendments to the CTCSP and WLA TIMP that are aligned with City policies for the study area, as articulated in the Community Plans for the Westwood, Brentwood-Pacific Palisades, West Los Angeles, Palms-Mar Vista-Del Rey, Venice, and Westchester-Playa Del Rey communities, and the LAX Specific Plan.
- Ensure the costs for transportation improvements within the study area are fairly distributed among all future land uses that will contribute to transportation impacts.
- Update Transportation Impact Assessment (TIA) fees to provide a mechanism to fund specific transportation improvements that aims to decrease the cumulative impacts of new development and increase person throughput by increasing mobility options within the Westside.
- Update the TIA fee methodology to better align with a multimodal approach to planning for future transportation improvements.
- Update the TIA fee methodology to reflect an improved approach for measuring and addressing transportation impacts.

Secondary Objectives of the Specific Plan Amendments:

- Establish TIA fees that do not hinder the development of housing for diverse income levels in the Westside, including affordable housing for moderate, low, and very low income levels.
- Streamline the Specific Plan implementation process by aligning the CTCSP and WLA TIMP Specific Plan procedures with established City procedures.
- Develop consistent policy language between the CTCSP and WLA TIMP in order to make them easier to implement and administer.

6.4 Selection of Alternatives for Analysis

According to the State CEQA Guidelines, the discussion of alternatives should focus on alternatives to a project or its location that can feasibly avoid or lessen the significant effects of the project. The State CEQA Guidelines further indicate that the range of alternatives included in this discussion should be sufficient to allow decision makers a reasoned choice. The alternatives discussion should provide decision makers with an understanding of the merits and disadvantages of these alternatives.

Alternatives to the Proposed Project were identified on the basis of their ability to feasibly attain most of the basic objectives of the project while lessening or avoiding the project's significant environmental effects. Alternatives were identified based on 1) feasibility, 2) the potential to avoid or

lessen significant project-related impacts, 3) their ability to meet project objectives, and 4) their ability to reasonably inform the decision-maker and the public regarding a range of options. The alternative selection did not consider an alternative that would reduce impacts through the addition of new right-of-way to the City's circulation plan as it was determined to be inconsistent with the Mobility Plan 2035 goals and policies regarding the use of existing right-of-way and the reduction of VMT. The alternatives selection also considered community input and a desire to evaluate options with potentially lesser costs.

There are no feasible and reasonable alternatives that would avoid or substantially lessen the significant impacts associated with the Proposed Project and would satisfy a majority of project goals and objectives. Even without the project, permanent significant operational impacts related to traffic are expected due to increased development and background growth. These include impacts to the vehicular circulation system, impacts resulting from neighborhood intrusion, and impacts to CMP and state freeway facilities. The alternatives selected and evaluated in this section satisfy some project objectives, even if they impede others, and are expected to reduce the intensity of at least one significant environmental effect caused by the Proposed Project.

Given that the Proposed Project is comprised of numerous transportation improvements throughout the Westside, it is not reasonable to separately evaluate alternatives to each proposed transportation improvement or corridor, nor is that required by CEQA. Rather the Proposed Project is evaluated as a package of transportation improvements. Aside from the No Project Alternative, the alternatives evaluated in this EIR are variations on the Proposed Project. Only variations that could meet core or fundamental project objectives, which include improving transportation options for multimodal travel (consistent with the Complete Streets Act, SB 743, the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy [RTP/SCS], General Plan Framework Element, and the MP 2035), reducing vehicle miles traveled (consistent with the SB 743, 2012-2035 RTP/SCS General Plan Framework Element, and MP 2035), and reducing greenhouse gas emissions (consistent with a number of state regulatory initiatives, including AB 32, SB 375, and SB 743, as well as regional and local plans, such as the 2012-2035 RTP/SCS, Green LA Plan, General Plan Framework Element, and MP 2035), were selected. With respect to the City's overall objectives as reflected in the General Plan Framework Element, the alternatives selection strives to connect transportation and land use planning serving a balanced distribution of land uses and promoting an improved quality of life by reducing vehicle trips and associated air emissions. These alternatives were developed to be more consistent with the City's latest transportation improvement implementation strategies. Two alternatives (2A and 2B) offer variations to the list of proposed transportation improvements – variations that do not include key dedicated transit lines. Two other alternatives (3A and 3B) offer variations on how the Proposed Project's transportation improvements would be achieved within the limited existing right-of-way available. Some of the Proposed Project's transportation improvements (such as dedicated transit or bike lanes) may require reallocation of existing roadway. Alternatives 3A and 3B provide the information necessary to compare the impacts of removing parking lanes versus vehicle travel lanes. The evaluation of variations on the Proposed Project provides the decision maker with information necessary to understand the merits and disadvantages of key components of the Proposed Project.

The following alternatives were evaluated in this EIR.

- **Alternative 1 - No Project:** Section 15126.6(e) of the State CEQA Guidelines requires evaluation of the No Project Alternative. As described in the State CEQA Guidelines, the purpose of describing and analyzing the No Project Alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. Therefore, as required by the State CEQA Guidelines, the No Project Alternative consists of conditions that might be expected to occur in the foreseeable future if the Proposed Project was not approved.

  The No Project Alternative assumes continued implementation of the current CTC and WLA TIMP Specific Plans, with continuation of current fees (with annual adjustments) and implementation of existing project lists. Under the No Project Alternative, select roadway widenings and intersection improvements would continue to remain on the project lists, and more projects aimed at increasing vehicle capacity in the Westside would be considered for implementation. While widening opportunities are limited, some vehicle capacity projects were assumed to be implemented in the Westside under the No Project Alternative. These improvements would require acquisition of right-of-way, including the demolition of buildings on parcels adjacent to existing roadways. Acquisition could occur either through development dedications (which would occur gradually over time as parcels are redeveloped) or if the City of Los Angles were to acquire portions or whole parcels. For the most part, acquired parcels would consist of commercial and retail uses, although some residential uses may also require acquisition. Demolition of commercial and retail uses would be disruptive and would physically alter the makeup of existing communities. In addition, elimination of neighborhood commercial uses could result in residents traveling greater distances to access necessary amenities. Acquisition of private property to enable the roadway widenings would also be very costly. Consequently, the project lists under the No Project Alternative reflect transportation projects that would be difficult to implement and the associated improvements to vehicle operations/level of service (LOS) may not be realized. However, for the purposes of comparing the environmental impacts of the No Project Alternative to the Proposed Project, limited roadway widening projects resulting in increased vehicular capacity are evaluated in this section.

- **Alternative 2A – No Sepulveda Boulevard BRT:** Under Alternative 2A, the proposed BRT on Sepulveda Boulevard would be eliminated from the CTCSP and WLA TIMP proposed transportation improvement lists. The current lane configuration on Sepulveda Boulevard would be maintained (i.e., no loss of vehicular capacity). All elements of the Proposed Project other than the Sepulveda Boulevard BRT are included in Alternative 2A. This alternative is expected to result in a reduction to the following significant impacts from the Proposed Project: (1) operational traffic along Sepulveda Boulevard in the project area by maintaining existing vehicular capacity, (2) neighborhood traffic intrusion, and (3) air quality, noise and vibration, and traffic impacts related to construction in the area around Sepulveda Boulevard.

- **Alternative 2B – No Lincoln Boulevard BRT:** Under Alternative 2B, the proposed BRT on Lincoln Boulevard would be eliminated from the CTCSP proposed transportation improvement list. The current lane configuration on the majority of Lincoln Boulevard would be maintained (i.e., no loss of vehicular capacity). Under this alternative, the Lincoln Boulevard Bridge would still be widened to accommodate additional vehicle lanes, bicycle lanes, and pedestrian access. All elements of the Proposed Project other than the Lincoln Boulevard BRT are included in Alternative 2B. This alternative is expected to result in a reduction to the following significant

impacts from the Proposed Project: (1) operational traffic along Lincoln Boulevard in the project area by maintaining existing vehicular capacity, (2) neighborhood traffic intrusion, and (3) air quality, noise and vibration, and traffic impacts related to construction in the area around Lincoln Boulevard.

- **Alternative 3A – Reduced Parking:** The Proposed Project assumes that when additional right-of-way for projects (such as BRT and bicycle facilities) is needed, it would be provided through a combination of vehicular capacity reductions (lane conversions) along with on-street parking removal. Under the Reduced Parking Alternative, when additional right-of-way is required, it would be provided solely by removing street parking, with no conversion of vehicle travel lanes. All of the transportation improvements associated with the Proposed Project are included in this alternative; this alternative offers a distinction as to how right-of-way would be utilized in order to implement the proposed transportation improvements. This alternative is expected to result in a reduction to the following significant impacts from the Proposed Project: (1) operational traffic along certain corridors in the Specific Plan areas by maintaining existing vehicular capacity, and (2) neighborhood traffic intrusion.

- **Alternative 3B – Reduced Vehicle Capacity:** The Proposed Project assumes that when additional right-of-way for projects (such as BRT and bicycle facilities) is needed, it would be provided through a combination of vehicular capacity reductions (lane conversions) along with on-street parking removal. Under this alternative, when additional right-of-way is required, it would be provided solely by converting vehicle travel lanes into transit/bicycle facilities, with no removal of on-street parking. All of the transportation improvements associated with the Proposed Project are included in this alternative; this alternative offers a distinction as to how right-of-way would be utilized for the proposed transportation improvements. This alternative would not reduce or eliminate any significant impacts associated with the Proposed Project. This alternative was selected in order to provide decision makers and the public with a choice in transportation priorities.

6.5 Alternatives Considered but Rejected as Infeasible

In accordance with the State CEQA Guidelines, an EIR should identify any alternatives that were considered by the lead agency but were rejected as infeasible and briefly explain the reasons underlying the lead agency's determination. Section 15126.6(c) of the State CEQA Guidelines states the following:

> The EIR should identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination…Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

Seven alternatives were considered but rejected as infeasible, as follows:

- **Residential Fee Exemption Alternative –** This alternative would continue the TIA fee exemption on new residential development, resulting in fewer fees collected. There would be no change to the proposed projects lists under the Residential Fee Exemption Alternative. Since AB 1600 requires all users to pay their fair share, the lost revenues under this alternative could not be made up by increasing the fees on other uses; therefore, backfill funding from other sources

would be required as the TIA fees would fund a lower percentage of the project costs. As such, this alternative would not meet one of the primary objectives of the Specific Plan Amendments: "Ensure the costs for transportation improvements within the study area are fairly distributed among all future land uses that will contribute to transportation impacts." No other sources of funding have been identified that would make up for the loss of funding under this alternative. Moreover, the Residential Fee Exemption Alternative would not reduce or avoid any of the significant environmental effects associated with the Proposed Project, as the same transportation improvements would be implemented under this alternative. Because the Residential Fee Exemption Alternative would not meet one of the primary project objectives (fair-share) and would not avoid or substantially lessen any of the significant effects of the Proposed Project, the alternative will not be carried forward for analysis in the EIR.

- **Reduced Fee Alternative –** The Reduced Fee Alternative would reduce the proposed TIA fees associated with the Proposed Project. There would be no change to the proposed transportation improvement lists under the Reduced Fee Alternative. The Reduced Fee Alternative could be implemented in a few different ways: modify exemption for free-standing/locally serving retail <20,000 square feet, reduce the residential fee, include a more aggressive affordable housing credit, or cap fees at a specified amount. If selected fees were reduced, or capped, fewer fees would be collected. Since Assembly Bill 1600 requires all users to pay their fair share, the lost revenues under this alternative could not be made up by increasing the fees on other uses; therefore, backfill funding from other sources would be required as the TIA fees would fund a lower percentage of the project costs. As such, this alternative would not meet one of the primary objectives of the Specific Plan Amendments: "Ensure the costs for transportation improvements within the study area are fairly distributed among all future land uses that will contribute to transportation impacts." No other sources of funding have been identified that would make up for the loss of funding under this alternative. Moreover the environmental impacts of the Reduced Fee Alternative would not reduce or avoid any of the significant environmental effects associated with the Proposed Project. Because the Reduced Fee Alternative would not meet one of the primary project objectives (fair-share) and would not avoid or substantially lessen any of the significant effects of the Proposed Project, the alternative will not be carried forward for analysis in the EIR.

- **Maintain Existing Lincoln Bridge Alternative –** Under this alternative, the Lincoln Bridge would not be widened (i.e., Lincoln Bridge Widening would be eliminated from the CTCSP proposed transportation improvement list). Lincoln Boulevard is a major transportation corridor in the Westside, spanning from LAX to Santa Monica, and serves daily traffic volumes ranging from 44,000 to 62,000 vehicles. The Lincoln Bridge is a bottleneck in traffic flow, primarily in the southbound direction where Lincoln Boulevard reduces from three to two travel lanes over the bridge. Traffic congestion would be worse under the existing bridge configuration as compared to the Proposed Project. Currently, the existing bridge is not wide enough to accommodate multimodal transportation options, including transit, bicycle facilities, or pedestrian access. Elimination of the bridge widening from the proposed transportation improvement list would foreclose the option of accommodating a transit only lane, bicycle facilities and sidewalks on the bridge. As a result, the VMT benefits, and the related greenhouse gas (GHG) emission reduction benefits, associated with the provision of multimodal transportation options that would be accommodated by the bridge widening would not be realized. Although the bridge widening would add a third southbound travel lane, this lane addition would not be expected to result in induced traffic demand that would offset the VMT

and GHG emission reduction benefits associated with the provision of multimodal options. This is because the bridge widening would only relieve an existing bottleneck in a very specific area. Currently, Lincoln Boulevard provides three travel lanes in both directions north and south of the bridge; it is only on the bridge itself, and on the bridge approach and departure, that the southbound lanes are reduced to two. Elimination of the bottleneck is not expected to result in a substantial increase in demand along the corridor overall. Therefore, it anticipated that maintaining the existing Lincoln Boulevard Bridge (i.e., eliminating the proposed widening of the bridge) would result in higher VMT and greater greenhouse gas emissions in the future than would occur under the Proposed Project. This alternative would not meet the key primary objective of the project transportation improvements of providing multimodal transportation options along this major corridor. In addition, this alternative would not meet other primary objectives of the project transportation improvements, including reduction of greenhouse gas emissions through provision of multiple modes of transportation; enhancing mobility along key Westside transportation corridors, particularly by planning for dedicated transit lines that serve north-south corridors; and encouraging walking and bicycling. Because this alternative would not address most of the primary objectives of the Proposed Project along this major transportation corridor, the alternative will not be carried forward for analysis in the EIR.

- **Light Rail Transit (LRT) on Sepulveda Boulevard and Lincoln Boulevard Alternative –** Under this alternative, LRT instead of BRT would be provided on Sepulveda and on Lincoln boulevards. This alternative has the potential to result in lower VMT in the region, provided demand is sufficient that ridership would be greater than BRT in the planning horizon. If demand were sufficient to provide greater ridership than LRT, traffic congestion would be decreased along these corridors within the planning horizon, which would be accompanied by a decrease in air quality and greenhouse gas emissions. However, construction-related impacts would be greater than the Proposed Project. Costs under this alternative would be substantially higher than the Proposed Project, resulting in either higher fees or fewer of the transportation improvement projects being implemented within the planning horizon. If fewer projects were implemented, other project objectives may not be realized, with the potential for environmental impacts to occur, such as increased air quality and greenhouse gas emissions from greater vehicular traffic on other corridors in the absence of proposed transportation improvements. At this time, the costs associated with LRT on Sepulveda Boulevard and Lincoln Boulevard would be so high as to hinder the TIA fee program's ability to partially fund and build out a comprehensive transportation multimodal network on the Westside. Therefore the LRT on Sepulveda Boulevard and Lincoln Boulevard Alternative will not be carried forward for analysis in the EIR.

- **Westwood Boulevard Transit or Bike Lanes with Travel Lane Removal Alternative –** This alternative would include transit and/or bike lanes on Westwood Boulevard to provide for multimodal travel options by removing a travel lane(s). The elimination of vehicular travel lanes would result in greater traffic congestion along Westwood Boulevard compared to the Proposed Project. This alternative would not eliminate or reduce any significant impacts associated with the Proposed Project. For these reasons**,** the alternative will not be carried forward for analysis in the EIR.

- **Reduced Bicycle Enhancement Alternative** – This alternative would exclude bicycle enhancements that would require the elimination of vehicle lanes. This alternative would reduce congestion impacts by retaining vehicle lanes. However, because this alternative would not achieve the primary project objective of increasing modal opportunities, the alternative will not be carried forward for analysis in the EIR.

- **Reduced Bus Improvement Alternative** – The curb-running bus improvements associated with the Proposed Project could potentially result in significant operational noise impacts from increased bus operations in proximity to sensitive receptors. This alternative would eliminate curb-running bus improvements that would result in significant operational noise impacts. This could be accomplished by either eliminating curb-running bus projects from selected corridors where impacts to sensitive receptors could occur or by limiting the frequency of new bus activity along these corridors to a level that would ensure that increases in operational noise would not exceed 3 A-weighted decibels (dBA) at sensitive receptors, which is the level at which operational noise impacts are considered to be significant. The Reduced Bus Improvement Alternative is the only alternative that would avoid this potentially significant operational noise impact. However, this alternative would not achieve the fundamental and primary project objectives of increasing modal opportunities, reducing vehicle trips and VMT per Capita, and reducing GHG. Improvements to bus service—including curb-running bus service, BRT, expanded service routes and frequency, and other improvements—are a key to the mobility improvements associated with the Proposed Project, and represent the greatest factor in achieving reduced VMT and reduced VMT per Capita in the future compared to Future without Project conditions. Moreover, at the current level of planning, a significant operational noise impact associated with curb-running bus activity cannot be affirmatively determined. The conclusion in Section 4.5, *Noise and Vibration*, states that it is not likely that improvements to bus service, including the provision of curb-running BRT, would result in significant impacts. However, in the absence of detailed information regarding expanded bus routes and operational frequency, the EIR makes a conservative assumption that bus activity *may* result in significant impacts at sensitive receptors. Therefore, it is possible that a significant impact would not occur with implementation of the Proposed Project. If this were the case, reducing bus improvements would not avoid or reduce the severity of a significant impact associated with the Proposed Project. For these reasons, this alternative will not be carried forward for analysis in the EIR.

6.6 Analysis Methodology

Each of the alternatives selected for analysis is evaluated in sufficient detail to determine whether its overall environmental impacts would be lesser, similar, or greater in comparison to the impacts of the Proposed Project. The impact analysis sections for the Proposed Project (within Chapter 4, *Environmental Impacts*, of this EIR) identify mitigation measures that would reduce the environmental impacts of the Proposed Project. The following analyses assume that equally effective mitigation measures would apply to the alternatives.

As discussed in the NOP prepared for the Proposed Project (provided in Appendix C, *Notice of Preparation/Scoping,* of this Draft EIR), the City determined, pursuant to State CEQA Guidelines Section 15060(d), that impacts of the Proposed Project would be less than significant for the following resource areas: aesthetics, agricultural and forestry resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, mineral resources, population and housing, public services, recreation, and utilities and service systems. As the build alternatives

evaluated in this section are variations on the Proposed Project, they would not reasonably be expected to have significant impacts on any of these environmental areas; therefore, discussion of these environmental areas is not included in the analysis of the build alternatives. However, it is possible that implementation of the No Project Alternative could result in impacts to these environmental areas. These potential impacts are addressed in Section 6.7.1.7 below.

The alternatives analysis includes the following:

- An evaluation of the environmental impacts anticipated to occur for each environmental issue analyzed in Chapter 4, *Environmental Impacts*, of this EIR and a determination as to the significance of those impacts. This discussion also includes an analysis of whether the alternative would avoid or substantially lessen any of the significant environmental impacts associated with the Proposed Project. Where the impacts of the alternative and the Proposed Project were roughly equivalent, the comparative impact is said to be similar.
- Identification of the Environmentally Superior Alternative.

6.7 Comparative Impact Analysis

This section describes the potential environmental impacts associated with each alternative, as compared to the impacts of the Proposed Project. **Table 6-1** summarizes the comparative effects, with the supporting analysis provided in the subsections that follow. Conclusions indicated in Table 6-1 regarding the level of significance of impacts assume mitigation (i.e., level of significance after mitigation).

The core or fundamental objectives of the Proposed Project are to improve transportation options for multimodal travel on the Westside, reduce vehicle miles traveled, and reduce greenhouse gas emissions. Other than the No Project Alternative, the alternatives evaluated offer variations on Proposed Project that still meet these core objectives. Alternatives 2A and 2B offer variations to the proposed transportation improvement list that do not include key dedicated transit lines. Alternatives 3A and 3B offer variations on how the Proposed Project's transportation improvements would be achieved within the limited existing right-of-way available. Some of the Proposed Project's transportation improvements (such as dedicated transit or bike lanes) may require reallocation of existing roadway space. Alternatives 3A and 3B provide a comparative analysis of removing parking lanes versus vehicle travel lanes.

6.7.1 Alternative 1 - No Project

The No Project Alternative assumes continued implementation of current CTC and WLA TIMP Specific Plans, with continuation of current fees (with annual adjustments) and implementation of existing project lists. Under the No Project Alternative, select roadway widenings and intersection improvements would continue to remain on the project lists, and more projects aimed at increasing vehicle capacity in the Westside would be considered for implementation. While widening opportunities are limited, some vehicle capacity projects were assumed to be implemented in the Westside under the No Project Alternative. As noted in Section 6.4, implementation of these projects would require acquisition of private property and demolition of community-serving uses that would be disruptive to existing communities and very costly. Consequently, the project lists under the No Project Alternative reflect transportation projects that would be difficult to implement and the associated improvements to vehicle operations/LOS may not be realized. However, for the purposes

of comparing the environmental impacts of the No Project Alternative to the Proposed Project, limited roadway widening projects resulting in increased vehicular capacity are evaluated in this section.

As compared to the Proposed Project, fewer multimodal transportation improvements would be added to the Westside. Without the Proposed Project's transportation improvements, fewer vehicle lanes and parking lanes would be removed. The No Project Alternative would provide greater vehicle roadway capacity but less transit capacity, less multimodal connectivity, and fewer active transportation options throughout the study area. The No Project Alternative would result in major construction on a substantially greater number of roadways in the Specific Plan areas. In addition, the level of construction activity along the roadways to be widened would be greater than would occur under the Proposed Project as projects under the No Project Alternative would require additional right-of-way, and would involve demolition of adjacent land uses. The following analysis discusses the potential impacts associated with Alternative 1, the No Project Alternative, compared to those of the Proposed Project.

6.7.1.1 Air Quality

Conflict with Air Quality Plans. As with the Proposed Project, the No Project Alternative would not result in alterations in land use patterns in the project area and would not affect future regional development anticipated in the 2012-2035 RTP/SCS or incorporated as assumptions in the Air Quality Management Plan (AQMP). If all of the improvements on the current project lists were completed, the No Project Alternative would provide increased vehicular roadway capacity in the Westside but the implementation of multimodal transportation improvements would be substantially lower than under the Proposed Project.

The purpose of the 2012 AQMP is to provide updated air pollution control strategies to bring the South Coast Air Basin (SoCAB) into compliance with federal ambient air quality standards. The AQMP relies upon a number of strategies to meet the federal ambient air quality standards, including promotion of a sustainable transportation system that emphasizes transit and non-motorized transportation and that improves multimodal mobility and minimizes VMT. These goals are also reflected in the 2012-2035 RTP/SCS, the City of Los Angeles Air Quality Element, and the MP 2035. The Proposed Project is anticipated to reduce daily project area VMT by 3.4 percent as compared to future conditions without the Proposed Project. Per capita VMT would decrease by 4.4 percent compared to existing conditions and by 3.4 percent compared to Future without Project conditions. With its emphasis on improvements to the vehicular network, it is expected that total VMT and VMT per Capita would be greater under the No Project Alternative than under the Proposed Project, with a comparative increase in air emissions. In addition, the No Project Alternative would not provide for multimodal transportation options throughout the Westside. By adding more vehicular capacity, and not promoting a reduction in per capita VMT, the No Project Alternative would increase air emissions in comparison to the Proposed Project. As a result, the No Project Alternative would not achieve the same level of consistency with the AQMP, the 2012-2035 RTP/SCS, the City of Los Angeles Air Quality Element, or the MP 2035 as would the Proposed Project.

Table 6-1 Comparison of Alternatives to the Proposed Project

	Project		Alternative 1 No Project		Alternative 2A No Sepulveda Blvd BRT		Alternative 2B No Lincoln Blvd BRT		Alternative 3A Reduced Parking		Alternative 3B Reduced Vehicle Capacity	
	Construction	Operation	Construction	Operation	Construction	Operation	Construction	Operation	Construction	Operation	Construction	Operation
Air Quality												
Conflict with Air Quality Plans	LS	LS	LS – Similar	LS – Greater	LS – Similar	LS – Greater	LS – Similar	LS – Greater	LS – Similar	LS – Similar	LS – Similar	LS – Similar
Violate Air Quality Standard	LS	LS	LS – Similar	LS – Greater	LS – Fewer	LS – Greater	LS – Fewer	LS – Greater	LS – Similar	LS – Similar	LS – Similar	LS – Similar
Cumulative Impacts	**SU**	LS	**SU – Greater**	LS – Greater	**SU – Fewer**	LS – Greater	**SU – Fewer**	LS – Greater	**SU – Similar**	LS – Similar	**SU – Similar**	LS – Similar
Substantial Pollutant Concentrations	**SU**	LS	**SU – Greater**	LS –Greater	**SU – Fewer**	LS – Greater	**SU – Fewer**	LS – Greater	**SU – Similar**	LS – Similar	**SU – Similar**	LS – Similar
Odors	LS	LS	LS – Similar	LS – Similar	LS – Similar	LS – Similar	LS – Similar	LS – Similar	LS – Similar	LS – Similar	LS – Similar	LS – Similar
Biological Resources												
Effects on Sensitive Species/Habitats/Wetlands	M	LS	M – Greater (Birds); **NI** (BWER)	LS – Similar	M – Similar	LS – Similar	M – Similar	LS – Similar	M – Similar	LS – Similar	M – Similar	LS – Similar
Effects on Migratory Species/Wildlife Corridors	M	LS	M – Greater	LS – Similar	M – Similar	LS – Similar	M – Similar	LS – Similar	M – Similar	LS – Similar	M – Similar	LS – Similar
Greenhouse Gas Emissions												
GHG Emissions	LS	LS	LS – Similar	LS – Greater	LS – Fewer	LS – Greater	LS – Fewer	LS – Greater	LS – Similar	LS – Similar	LS – Similar	LS – Similar
Impede Attainment of SCAG Reduction Targets	LS	LS	LS – Similar	LS – Greater	LS – Similar	LS – Greater	LS – Similar	LS – Greater	LS – Similar	LS – Similar	LS – Similar	LS – Similar
Conflict with GHG Reduction Policies	LS	LS	LS – Similar	LS – Greater	LS – Similar	LS – Greater	LS – Similar	LS – Greater	LS – Similar	LS – Similar	LS – Similar	LS – Similar
Land Use and Planning												
Physically Divide a Community	LS	LS	LS – Similar	LS – Greater	LS – Fewer	LS – Fewer	LS – Fewer	LS – Fewer	LS – Similar	LS – Greater	LS – Similar	LS - Fewer
Conflict with Applicable Plans	LS	LS	LS – Greater	LS – Greater	LS – Similar	LS – Greater	LS – Similar	LS – Greater	LS – Similar	LS – Similar	LS – Similar	LS – Similar
Noise and Vibration												
Exceed General Plan/Noise Ordinance Standards	**SU**	**SU**	**SU – Greater**	**LS**	**SU – Fewer**	**SU – Similar**	**SU – Fewer**	**SU – Similar**	**SU – Similar**	**SU – Similar**	**SU – Similar**	**SU – Similar**
Excessive Groundborne Vibration/Noise	**SU**	LS	**SU – Greater**	LS – Similar	**SU – Fewer**	LS – Similar	**SU – Fewer**	LS – Similar	**SU – Similar**	LS – Similar	**SU – Similar**	LS – Similar
Substantial Permanent Increase in Ambient Noise	NA	**SU**	NA	**LS**	NA	**SU – Similar**	NA	**SU – Similar**	NA	**SU – Similar**	NA	**SU – Similar**
Substantial Temporary Increase in Ambient Noise	**SU**	NA	**SU – Greater**	NA	**SU – Fewer**	NA	**SU – Fewer**	NA	**SU – Similar**	NA	**SU – Similar**	NA
Exposure to Aircraft-Related Noise	LS	LS	LS – Similar	LS – Similar	LS – Similar	LS – Similar	LS – Similar	LS – Similar	LS – Similar	LS – Similar	LS – Similar	LS – Similar
Transportation												
Conflict with Transportation Plans	--	LS	--	LS – Greater	--	LS – Greater	--	LS – Greater	--	LS – Similar	--	LS – Similar
Circulation System Performance Standards	--	**SU**	--	**SU – Similar or Fewer**	--	**SU – Similar or Fewer**	--	**SU – Similar or Fewer**	--	**SU – Fewer**	--	**SU – Greater**
Neighborhood Traffic Intrusion	--	**SU**	--	**SU – Similar or Fewer**	--	**SU – Similar or Fewer**	--	**SU – Similar or Fewer**	--	**SU – Fewer**	--	**SU – Greater**
Conflict with CMP	--	**SU**	--	**SU** – Similar	--	**SU – Similar**	--	**SU – Similar**	--	**SU – Similar**	--	**SU – Similar**
Fire Protection/Emergency Access	--	LS	--	LS – Similar	--	LS – Similar	--	LS – Similar	--	LS – Similar	--	LS – Similar
Public Transit, Bicycle, Pedestrian Facilities	--	LS	--	LS – Greater	--	LS – Greater	--	LS – Greater	--	LS – Similar	--	LS - Similar
Transportation Safety	--	LS	--	LS – Greater	--	LS – Similar	--	LS – Similar	--	LS – Similar	--	LS – Similar
Construction on Major Corridors	**SU**	NA	**SU – Greater**	NA	**SU – Fewer**	NA	**SU – Fewer**	NA	**SU – Similar**	NA	**SU** – Similar	NA
Parking	--	LS	--	LS – Fewer	--	LS – Fewer	--	LS – Fewer	--	LS – Greater	--	LS – Fewer
Consideration of Potential New Metrics	--	LS	--	PS	--	LS – Similar or Greater	--	LS – Similar or Greater	--	LS – Similar	--	LS – Similar

Source: CDM Smith, Fehr & Peers, 2015.

Key:

LS = Less Than Significant
M = Less Than Significant with Mitigation
NA = Not Applicable
NI = No Impact
PS = Potentially Significant (only used in association with possible new transportation metrics)
SU = Significant and Unavoidable

Notes:

A designation of "Greater" indicates that the impact would be greater as compared to the Proposed Project. In cases where the impact is a measure of consistency, an alternative that would be less consistent than the Proposed Project would have a greater impact.
For Transportation, construction-related impacts are identified as a separate topic (Construction on Major Corridors) as opposed to in each impact discussion.
Bold highlighted text denotes a change in the level of significance as compared to the Proposed Project.
Red text denotes an increase in the severity of a significant impact as compared to the Proposed Project, although the impact would remain significant and unavoidable.
Green text denotes a decrease in the severity of a significant impact as compared to the Proposed Project, although the impact would remain significant and unavoidable.

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Violate Air Quality Standards. Similar to the Proposed Project, the No Project Alternative would generate construction emissions from construction of roadway improvements. As with the Proposed Project, construction emissions under the No Project Alternative would not exceed South Coast Air Quality Management District (SCAQMD) thresholds, and construction impacts would not conflict with or obstruct implementation of the AQMP. Therefore, as with the Proposed Project, the No Project Alternative would not result in a significant impact related to air quality standards.

As explained in Section 6.7.1.6, with background growth and induced demand, the No Project Alternative would result in higher total VMT compared to existing conditions. Although traffic volumes would be higher, pollutant emissions from mobile sources are expected to be much lower due to technological advances in vehicle emission control, turnover in the vehicle fleet, and new emission standards. As a result, similar to the Proposed Project, emissions under the No Project Alternative would not exceed the SCAQMD significance thresholds. Although emissions would be less than significant under the No Project Alternative, with its emphasis on improvements to the vehicular network, VMT in the future under this alternative would be greater than under the Proposed Project and emissions would be higher.

Cumulatively Considerable Increase in Criteria Pollutants. Similar to the Proposed Project, the No Project Alternative would generate regional emissions from construction of roadway improvements. As with the Proposed Project, construction emissions of the nonattainment pollutants (PM10, PM2.5, and ozone (O_3) precursors [nitrogen oxides (NOx) and volatile organic compounds (VOC)]) under the No Project Alternative would be less than the SCAQMD significance thresholds. Therefore, regional construction emissions related to the No Project Alternative would not be cumulatively considerable, and impacts would be less than significant. However, it is anticipated that, similar to the Proposed Project, localized construction emissions of particulate matter associated with some of the transportation improvements would exceed SCAQMD thresholds. Therefore, localized construction emissions related to the No Project Alternative would be cumulatively considerable. This would be a significant impact.

With the technology advances noted above, as with the Proposed Project, operation of the proposed transportation improvements under the No Project Alternative would result in a decrease in emissions of the nonattainment pollutants PM10, PM2.5, and O_3 precursors (NOx and VOC) compared to existing conditions. Therefore, as with the Proposed Project, operational emissions associated with the No Project Alternative would not be cumulatively considerable and this impact would be less than significant. However, with its emphasis on improvements to the vehicular network, the No Project Alternative would generate more operational emissions and contribute less towards eliminating the region's cumulative impacts than the Proposed Project.

Expose Sensitive Receptors to Substantial Pollutant Concentrations. Under the No Project Alternative, there would be limited street and intersection approach widening projects associated with implementing the current CTCSP and WLA TIMP project lists. During construction, it is likely that PM10 and PM2.5 emissions associated with fugitive dust and engine exhaust could exceed the SCAQMD's Localized Significance Thresholds (LST), due to the potential proximity of these improvements to sensitive receptors. This would be a significant impact. Given the greater number of roadway improvements as compared to the Proposed Project, it is expected that LST impacts would occur in a larger number of locations than the Proposed Project.

Similar to the Proposed Project, it is expected that toxic air contaminant (TAC) emissions in the form of diesel particulate matter (DPM) would be emitted from heavy-duty diesel powered equipment. DPM emissions would be expected to be typical for urban environments in the study area. Nevertheless, based on Office of Environmental Health Hazard Assessment's (OEHHA)recently adopted methodology for estimating risk, the road and intersection widening projects could generate emissions that would exceed the SCAQMD thresholds for TACs. This would be a significant and likely unavoidable impact. This impact would be similar to the impact associated with the Proposed Project.

Relative to operations, as with the Proposed Project, under the No Project Alternative, with the vehicle emission control technologies noted above, emissions of mobile source air toxics (MSAT) would be lower than existing conditions and impacts would be less than significant. Although pollutant concentrations would be less than significant under the No Project Alternative, with its emphasis on improvements to the vehicular network, VMT in the future under this alternative would be greater than under the Proposed Project and concentrations would be higher.

Objectionable Odors Affecting a Substantial Number of People. Similar to the Proposed Project, the No Project Alternative would not create objectionable odors affecting a substantial number of people, and the impact would be less than significant.

6.7.1.2 Biological Resources

Adverse Effects on Sensitive Species, Sensitive Habitats, or Wetlands. The No Project Alternative would avoid significant but mitigable impacts to special status species and habitat in the Ballona Wetlands Ecological Reserve (BWER) that would occur from construction of the Lincoln Boulevard Bridge Enhancement included in the Proposed Project.

Similar to the Proposed Project, some of the No Project Alternative improvements could result in the removal, trimming, or disturbance of street trees and ornamental landscaping that have the potential to support nesting migratory birds that are protected by the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code (CFGC). Construction activities occurring within the nesting season would have the potential to result in the removal or destruction of an active nest or direct mortality or injury of individual birds. Because the No Project Alternative would entail some roadway widening projects, impacts compared to the Proposed Project would likely be greater. As with the Proposed Project, this is a potentially significant impact; with mitigation, this impact would be less than significant.

Adverse Effects on Migratory Species or Wildlife Corridors. Habitat within the project area is generally fragmented and of low value (e.g., ornamental landscaping) and does not provide viable linkages or migration corridors between habitat areas. However, as noted above, street trees within or immediately adjacent to right-of-ways could potentially support migratory birds. As with the Proposed Project, construction activities associated with the No Project Alternative could result in the removal or destruction of an active nest or direct mortality or injury of individual birds. Because the No Project Alternative would entail some roadway widening projects, impacts compared to the Proposed Project would likely be greater. This would be a potentially significant impact; with mitigation, this impact would be less than significant.

6.7.1.3 Greenhouse Gas Emissions

Generation of GHG Emissions. Similar to the Proposed Project, the No Project Alternative would generate construction emissions from construction of roadway improvements. The 2012-2035 RTP/SCS estimated that construction emissions from all development activity in Los Angeles County would be approximately 0.2 percent of countywide GHG emissions in 2035 (Southern California Association of Governments [SCAG], 2012). As with the Proposed Project, construction-related emissions associated with the No Project Alternative would be a small portion of total construction emissions estimated in the 2012-2035 RTP/SCS, which themselves are expected to represent only 0.2 percent of countywide GHG emissions in 2035.

As with the Proposed Project, as explained in Section 6.7.1.6 below, with background growth and induced demand, the No Project Alternative would result in higher total VMT compared to existing conditions. Although traffic volumes would be higher, pollutants emissions from mobile sources are expected to be much lower due to technological advances in vehicle emission control, turnover in the vehicle fleet, and new emission standards. As a result, similar to the Proposed Project, under the No Project Alternative, impacts related to GHG emissions associated with operations, combined with amortized construction-related GHG emissions, would be less than significant. However, with its emphasis on improvements to the vehicular network, VMT in the future under this alternative would be greater than the Proposed Project and GHG emissions would be higher.

Impede Attainment of SCAG's per Capita Emission Reduction Targets. The Proposed Project is anticipated to reduce daily project area VMT by 3.4 percent as compared to future conditions without the Proposed Project and by 4.4 percent compared to existing conditions, with related decreases in GHG emissions. With its emphasis on improvements to the vehicular network, it is expected that total VMT and VMT per Capita would be greater under the No Project Alternative than under the Proposed Project. In addition, the No Project Alternative would not provide for multimodal transportation options throughout the Westside. By adding more vehicular capacity, and not promoting a reduction in per capita VMT, the No Project Alternative would increase GHG emissions in comparison to the Proposed Project. However, due to technological advances in vehicle emissions systems, projected turnover in the vehicle fleet, and future emission standards, GHG emissions associated with the No Project Alternative would be lower than existing conditions. Therefore, the No Project Alternative would not impede attainment of SCAG's per Capita emission reduction targets, although this alternative would not advance the goals of the RTP/SCS on the Westside to the extent associated with the Proposed Project, nor would it implement strategies developed by SCAG aimed at meeting GHG emission reduction targets.

Conflict with GHG Reduction Policies. As noted above, the Proposed Project is anticipated to reduce daily project area VMT by 3.4 percent as compared to future conditions without the Proposed Project and by 4.4 percent compared to existing conditions. With its emphasis on improvements to the vehicular network, it is expected that total VMT and VMT per Capita would be greater under the No Project Alternative than under the Proposed Project. In addition, the No Project Alternative would not provide for multimodal transportation options throughout the Westside. By adding more vehicular capacity, and not promoting a reduction in per capita VMT, the No Project Alternative would increase GHG emissions in comparison to the Proposed Project. As a result, the No Project Alternative would not achieve the same level of consistency with the 2012-2035 RTP/SCS, MP 2035, Plan for a Healthy Los Angeles, or Green LA Plan as would the Proposed Project.

6.7.1.4 Land Use and Planning

Division of a Community. Similar to the Proposed Project, construction of transportation facilities associated with the No Project Alternative would be expected to result in temporary, short-term access disruptions to adjacent land uses. Due to their temporary and generally short-term nature, these impacts would be less than significant.

As with the Proposed Project, new transportation facilities associated with the No Project Alternative would not be incompatible with surrounding land uses and would not create a barrier which could divide or isolate a community. However, unlike the Proposed Project, a limited number of right-of-ways and roadway cross sections would be wider compared to existing conditions under the No Project Alternative. The widening of limited number of right-of-ways under the No Project Alternative could encroach on existing private parcels and require the demolition of buildings on parcels adjacent to existing roadways. For the most part, acquired parcels would consist of commercial and retail uses, although some residential uses may also require acquisition. Demolition of commercial and retail uses would be disruptive and could physically alter the makeup of existing communities. In the absence of detailed information regarding necessary acquisition and demolition, the level of impact resulting from these changes cannot be determined at this time. However, these changes would not physically divide an established community. Therefore, impacts would be less than significant.

Land Use Plan Consistency. The No Project Alternative would not result in any changes in General Plan land designations or zoning classifications. However, compared to the Proposed Project, the No Project Alternative would not provide a robust list of multimodal transportation improvements and would not be responsive to the policies encouraging alternative transportation and sustainability contained in regional and local adopted plans. Specifically, the No Project Alternative would not fulfill the mandate of the California Complete Streets Act, as reflected in the recently-adopted MP 2035 and in the 2012-2035 RTP/SCS, to plan for a balanced, multimodal transportation network that meets the needs of all users. Moreover, it would not implement the improvements envisioned in MP 2035 or serve to reduce VMT per Capita in the study area. As some of these policies are intended to reduce environmental impacts to air quality and GHG, the inconsistency could increase impacts compared to the Proposed Project.

As with the Proposed Project, construction of the transportation improvements under the No Project Alternative would comply with existing City regulations governing construction, including prohibitions on roadway construction during peak hours. There are no policies in applicable land use plans that are directed at construction activities. Therefore, construction impacts would not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect and impacts would be less than significant.

6.7.1.5 Noise and Vibration

Expose Persons or Generate Excessive Noise Levels above Standards or Generate a Substantial Temporary or Permanent Increase in Ambient Noise Levels. Under the No Project Alternative, there would be several street widening projects associated with implementing the current project lists in the CTC and WLA TIMP Specific Plans. Construction equipment at times could generate noise levels up to 97 dBA at 50 feet from a sensitive noise receptor. As with the Proposed Project, even with adherence to the Los Angeles Municipal Code (LAMC), some construction activities associated with the No Project Alternative could exceed ambient noise levels by 10 dBA or more for more than one day at a noise sensitive use. Similarly, the No Project Alternative could result in noise impacts associated

with construction activities that could exceed existing ambient noise levels by 5 dBA or more at any noise sensitive use for more than ten days over a three month period. These impacts would be infrequent and of short duration and would only affect a small number of sensitive receptors. Nevertheless, as with the Proposed Project, this would be a significant and unavoidable impact.

During operations, increased vehicular capacity may increase traffic and vehicle speeds on some roadways, which could increase traffic-related noise levels. These changes would not reach a level that would exceed noise standards; as a result, noise impacts from vehicular traffic would be less than significant. The No Project Alternative does not envision regional multimodal improvements to the extent that would occur under the Proposed Project, and does not identify specific improvements, such as curb-running rapid buses and BRT that would be implemented under the Proposed Project. Therefore, under the No Project Alternative, the significant and unavoidable noise impact associated with improvements to bus service under the Proposed Project would not occur.

Generate Excessive Groundborne Vibration. Construction of road widening projects under the No Project Alternative would occur in proximity to nearby structures and sensitive receptors. Based on the typical construction equipment likely to be used during construction, it is not anticipated that construction activities would generate vibration that would adversely affect structures. However, construction activities could exceed the human annoyance vibration threshold for frequent events. Human annoyance impacts from vibration associated with the majority of construction activities would be infrequent and of short duration and would only affect a small number of sensitive receptors. Nevertheless, this would be a significant and unavoidable impact.

Similar to the Proposed Project, under the No Project Alternative, operational vibration impacts from vehicular traffic would be less than significant.

Expose People Within Proximity to Airports to Excessive Noise Levels. As with the Proposed Project, construction of transportation improvements associated with the No Project Alternative would not expose construction workers to excessive airport-related noise. Therefore, impacts would be less than significant.

Land uses in the project area would not change under the No Project Alternative. Therefore, the project would not expose residents to excessive airport-related noise and no operational impact would occur.

6.7.1.6 Transportation

Conflict with Transportation Policies, Plans, or Programs. Overall, the No Project Alternative would be generally consistent with applicable regional and local adopted plans and policies. The Proposed Project contains a more robust multimodal list of transportation improvements than the No Project Alternative and is much more responsive to the policies encouraging alternative transportation and sustainability contained in regional and local adopted plans. Nevertheless, as with the Proposed Project, impacts relating to consistency with adopted policies, plans and programs under the No Project Alternative would be less than significant. Compared to the Proposed Project, the No Project Alternative would provide more vehicular capacity and fewer multimodal opportunities; as a result, this alternative would generate more auto travel and result in higher VMT. Therefore, the No Project Alternative would be less consistent with adopted transportation policies, plans, and programs than the Proposed Project.

Exceed Thresholds for Roadway Operations on the Vehicular Circulation System. The No Project Alternative would continue to implement the projects in the current Specific Plans. This alternative would provide increased vehicular capacity through limited road widening projects and intersection improvements in the Westside, but the multimodal transportation improvements would be substantially less than under the Proposed Project. The projects remaining on the list of transportation improvements that have not yet been constructed primarily consist of roadway widening projects. These projects would be expected to improve traffic operations and LOS in the near-term; however, operations would likely be worse under Future with No Project Alternative conditions in comparison to existing conditions due to background growth and induced vehicle demand. On a regional level, traffic in the study area is anticipated to increase in conjunction with regional population, housing, and employment growth projected to occur in the future. This growth will occur with or without implementation of the No Project Alternative. The background growth influences the transportation analysis by accounting for the increased activity levels under Future with No Project Alternative conditions. Consequently, when comparing traffic operations under Future with No Project Alternative conditions to existing conditions, peak period congestion would be expected to continue to increase. In addition, research has shown that the demand for driving increases in congested areas when additional roadway capacity is provided, commonly referred to as induced demand (Handy, 2015). Specifically, a capacity expansion of 10 percent may result in an increase in VMT of 3 to 6 percent in the near-term and 6 to 10 percent in the long-term. As with the Proposed Project, impacts relating to roadway operations on the vehicular circulation system under the No Project Alternative would be significant and unavoidable. Compared to the Proposed Project, the No Project Alternative would provide additional roadway capacity that has the potential to result in modest improvements to vehicle operations in the near-term. However, it is expected that background growth and induced demand would erode these improvements to vehicle operations in the long-term. As a result, although it is possible that impacts to vehicle operations under the No Project Alternative could be less than the Proposed Project, it is expected that these impacts would likely be similar to the Proposed Project.

Consideration of New Potential Metrics. The No Project Alternative would provide increased vehicular roadway capacity, but the multimodal improvements would be substantially less than the Proposed Project. The Proposed Project benefits of distributing travelers across all modes of transportation (mode split) would not be realized under the No Project Alternative, and transit ridership would not increase to the levels envisioned with the Proposed Project. Induced demand resulting from roadway widenings would cause an increase in overall VMT and VMT per Capita in the Specific Plan areas. Mode split improvements and the associated reductions in VMT that would occur under the Proposed Project and that would help to meet the State's goals of reducing greenhouse gas emissions, as mandated by AB 32 and SB 375, would not occur under the No Project Alternative. In addition, these performance indicators are potential metrics for evaluating transportation impacts that may be included in future revisions to City's L.A. CEQA Thresholds Guide. While the City of Los Angeles has not yet developed thresholds for these metrics, the No Project Alternative would result in a decrease in mode shares for transit, biking and walking and an increase in VMT in comparison to the Proposed Project. Given this conclusion, the No Project Alternative could result in a significant adverse transportation impact under these potential new CEQA metrics.

Exceed Thresholds for Neighborhood Traffic Intrusion. The No Project Alternative would continue to implement the projects in the current Specific Plans. This alternative would provide increased vehicular roadway capacity, but the multimodal transportation improvements would be substantially less than under the Proposed Project. The projects remaining on the current lists of transportation

improvements that have not yet been constructed primarily consist of roadway widening projects. These projects would be expected to improve traffic operations along select corridors in the Specific Plan area in the near-term; however, overall operations would be worse under Future with No Project Alternative conditions in comparison to existing conditions. Along roadways where significant traffic congestion would occur under the No Project Alternative, diversion of trips could occur onto adjacent parallel routes. It is anticipated that diversion would not occur on streets that operate at LOS D or better during peak periods because the average delay is not substantial. However, for the street segments where the LOS would degrade from D to E or F, some trips could divert to adjacent streets to avoid longer travel times through congested locations. On a regional level, traffic in the study area is anticipated to increase in conjunction with regional population, housing, and employment growth projected to occur in the future. This growth will occur with or without implementation of the No Project Alternative. The background growth influences the transportation analysis by accounting for the increased activity levels under Future with No Project Alternative conditions. In addition, research has shown that the demand for driving increases in congested areas when additional roadway capacity is provided, commonly referred to as induced demand. Consequently, when comparing neighborhood traffic intrusion under Future with No Project Alternative conditions to existing conditions, traffic intrusion would be expected to continue to increase. As with the Proposed Project, impacts relating to neighborhood traffic intrusion under the No Project Alternative would be significant and unavoidable. Compared to the Proposed Project, the No Project Alternative would provide additional roadway capacity that has the potential to result in modest improvements to vehicle operations in the near-term, with a resulting decrease in neighborhood traffic intrusion. However, it is expected that background growth and induced demand would erode these improvements to vehicle operations in the long-term. As a result, the impact to neighborhood traffic intrusion would likely be similar to the Proposed Project.

Exceed Thresholds for CMP and State Freeway Facilities. The No Project Alternative would continue to implement the projects in the current Specific Plans. The No Project Alternative would provide increased vehicular capacity through road widening projects and intersection improvements in the Westside, but the multimodal transportation improvements would be substantially less than under the Proposed Project. The projects remaining on the list of transportation improvements that have not yet been constructed primarily consist of roadway widening projects. These projects would be expected to improve traffic operations along select corridors in the Specific Plan area in the near-term; however, overall operations would be worse under Future with No Project Alternative conditions in comparison to existing conditions. On a regional level, traffic in the study area is anticipated to increase in conjunction with regional population, housing, and employment growth projected to occur in the future. This growth will occur with or without implementation of the No Project Alternative. The background growth influences the transportation analysis by accounting for the increased activity levels under Future with No Project Alternative conditions. Consequently, when comparing traffic operations on CMP and state freeway facilities under Future with No Project Alternative conditions to existing conditions, congestion would be expected to continue to increase. As with the Proposed Project, impacts relating to CMP and state freeway facilities under the No Project Alternative would be significant and unavoidable. Compared to the Proposed Project, the No Project Alternative would result in similar impacts to CMP and state freeway facilities.

Adversely Affect Fire Protection Services/Emergency Access. The No Project Alternative would continue to implement the projects in the current Specific Plans. Based on the City's adopted threshold of significance, the No Project Alternative would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. Los Angeles Fire

Department (LAFD) is responsible for public safety and must respond to changing circumstances and therefore would act to maintain response times. The steps that LAFD would have to take to maintain public safety are not reasonably foreseeable at this time. Options available to LAFD include expanding the Fire Preemption System, increasing staffing levels, and adding new fire stations(s) to underserved areas. The potential for new fire station construction is speculative at the present time and is therefore not analyzed as part of the No Project Alternative. Depending on the location of new fire protection facilities, operational impacts (primarily noise) could occur; however, such impacts are unforeseeable at this time. As with the Proposed Project, impacts relating to emergency access under the No Project Alternative would be less than significant.

Disrupt Public Transit, Bicycle, or Pedestrian Facilities. Overall, the No Project Alternative would not disrupt existing public transit, bicycle, or pedestrian facilities or interfere with planned facilities. The Proposed Project contains a more robust multimodal list of transportation improvements than the No Project Alternative and is much more responsive to the policies encouraging alternative transportation and sustainability contained in regional and local adopted plans. As with the Proposed Project, impacts relating to the disruption to existing public transit, bicycle, or pedestrian facilities or interference with planned facilities under the No Project Alternative would be less than significant. Compared to the Proposed Project, the No Project Alternative would result in more roadway widenings to accommodate vehicular travel and would be less compatible with existing public transit, bicycle, or pedestrian facilities and planned facilities compared to the multimodal improvements envisioned as part of the Proposed Project.

Substantially Change Transportation Safety. The No Project Alternative would continue to implement the projects in the current Specific Plans. The No Project Alternative would provide increased vehicular capacity through road widening projects in the Westside, but the multimodal transportation improvements would be substantially less than under the Proposed Project. In addition, the roadway widenings contained in the No Project Alternative could result in an increase in travel speeds on select corridors in the Specific Plan areas due to capacity increases in the near-term. Automobile speed is a major factor in the severity of collisions with bicyclists and pedestrians, the most vulnerable roadway users. Collisions with a vehicle traveling at 20 miles per hour results in a 5 percent pedestrian fatality rate, and fatalities increase to 40, 80 and 100 percent when the vehicle speed increases to 30, 40 and 50 miles per hour, respectively (U. S. Department of Transportation National Highway Traffic Safety Administration, 1999). However, the transportation system improvements under the No Project Alternative would not introduce new safety hazards at intersections or along roadway segments, as they would be designed based on City standards. As with the Proposed Project, impacts relating to transportation safety would be less than significant. Compared to the Proposed Project, the No Project Alternative could increase travel speeds on select corridors and, along with an increase in the overall VMT in the study area, could lead to more transportation collisions than would occur under the Proposed Project.

Construction Activities on Major Corridors. The No Project Alternative would continue to implement the projects in the current Specific Plans. The projects remaining on the lists of transportation improvements that have not yet been constructed primarily consist of roadway widening projects. Some of the improvements in the No Project Alternative would consist of roadway restriping and limited changes to the physical configuration of curbs, and thus, would likely be short in duration (lasting up to a few weeks), while other projects, such as roadway widenings, would require longer construction duration. As with the Proposed Project, temporary construction impacts would be

significant and unavoidable. However, the No Project Alternative would result in a higher level of construction activity on a substantially greater number of roadways than the Proposed Project.

Parking. Parking deficits are considered to be social effects, rather than impacts on the physical environment as defined by CEQA. While a project's social impacts need not be treated as significant impacts on the environment, the secondary physical impacts that could be triggered by a social impact must be addressed. The No Project Alternative would continue to implement the projects in the current Specific Plans. The projects remaining on the list of transportation improvements that have not yet been constructed primarily consist of roadway widening projects. While some projects may result in the removal of on-street parking, it is speculative at this time to conclude that any particular parking will be removed for the No Project Alternative or that such removal would result in a significant impact. As with the Proposed Project, under the No Project Alternative, traffic impacts related to parking would be less than significant.

6.7.1.7 Other Environmental Topics

The limited roadway widening projects associated with the No Project Alternative have the potential to result in impacts to environmental topics that would not be affected by the Proposed Project. If the widening were to require the demolition of existing land uses, impacts to aesthetics could occur. Depending on the nature of the affected land uses, demolition could also result in impacts to historic resources. In addition, public utilities could be affected during construction. Standard mitigation measures are available to address many of the impacts typically associated with these resources, if warranted. It is expected that impacts to these environmental resources associated with the No Project Alternative would be less than significant.

6.7.2 Alternative 2A – No Sepulveda Boulevard BRT

Under Alternative 2A, the proposed BRT on Sepulveda Boulevard would be eliminated from the Proposed Project's transportation improvement lists. All other transportation improvements associated with the Proposed Project are included in this alternative. As compared to the Proposed Project, Alternative 2A would maintain current vehicle capacity along Sepulveda Boulevard. Alternative 2A would not provide an alternate dedicated north/south transit lane to serve the Westside and connect to existing and planned east/west transit. Alternative 2A would have comparatively more vehicle capacity along Sepulveda Boulevard but less transit capacity along this corridor and fewer multimodal connections to intersecting corridors. Alternative 2A assumes that the combination of lower transit capacity and greater vehicle capacity along this corridor would result in more VMT in the study area as compared to the Proposed Project. Alternative 2A would also result in less construction activity along Sepulveda Boulevard. The following analysis discusses the potential impacts associated with Alternative 2A compared to those of the Proposed Project.

6.7.2.1 Air Quality

Conflict with Air Quality Plans. As with the Proposed Project, Alternative 2A would not result in any alterations in land use in the project area and would not affect future regional development anticipated in the 2012-2035 RTP/SCS or incorporated as assumptions in the AQMP. Overall, Alternative 2A would improve mobility in the Westside by providing transportation options and conditions that would promote use of alternative forms of transportation, including public transit, bicycles and walking. However, elimination of the Sepulveda Boulevard BRT would not provide a dedicated transit line option on Sepulveda Boulevard, which is a major transportation corridor in the project area.

The purpose of the 2012 AQMP is to provide updated air pollution control strategies to bring the SoCAB into compliance with federal ambient air quality standards. The AQMP relies upon a number of strategies to meet the federal ambient air quality standards, including promotion of a sustainable transportation system that emphasizes transit and non-motorized transportation and that increases multimodal mobility and minimizes VMT. These goals are also reflected in the 2012-2035 RTP/SCS, the City of Los Angeles Air Quality Element, and MP 2035. The Proposed Project is anticipated to reduce daily project area VMT by 3.4 percent as compared to future conditions without the Proposed Project. Per capita VMT would decrease by 4.4 percent compared to existing conditions and by 3.4 percent compared to Future without Project conditions. Without the Sepulveda Boulevard BRT, it is expected that total VMT and VMT per Capita would be greater under Alternative 2A than under the Proposed Project, with a comparative increase in air emissions. Nevertheless, Alternative 2A would still reduce VMT per Capita in the project area compared to existing and Future without Project conditions and would result in a reduction in daily VMT compared to the Future without Project scenario. Overall, Alternative 2A would be aligned with the 2012-2035 RTP/SCS as well as relevant air quality policy objectives of the City's Air Quality Element, Plan for a Healthy Los Angeles, and MP 2035, although to a lesser degree than the Proposed Project.

Violate Air Quality Standards. Alternative 2A would reduce construction emissions compared to the Proposed Project as it would not include a center-running BRT on Sepulveda Boulevard. As with the Proposed Project, construction emissions under Alternative 2A would not exceed SCAQMD thresholds, and construction impacts would not conflict with or obstruct implementation of the AQMP. Therefore, as with the Proposed Project, Alternative 2A would not result in a significant impact related to air quality standards.

With background growth, Alternative 2A would result in higher total VMT compared to existing conditions. Although traffic volumes would be higher due to background growth, pollutant emissions from mobile sources are expected to be much lower due to technological advances in vehicle emission control, turnover in the vehicle fleet, and new emission standards. As a result, similar to the Proposed Project, emissions under this alternative would not exceed the SCAQMD significance thresholds. Although emissions would be less than significant under Alternative 2A, with the elimination of BRT on Sepulveda Boulevard, VMT in the future under this alternative would be greater than under the Proposed Project and emissions would be higher.

Cumulatively Considerable Increase in Criteria Pollutants. As noted above, with the elimination of the Sepulveda Boulevard BRT, regional construction emissions under Alternative 2A would be lower than those associated with the Proposed Project. Under both Alternative 2A and the Proposed Project, regional construction emissions of the nonattainment pollutants (PM10, PM2.5, and O_3 precursors [NOx and VOC]) would be less than the SCAQMD significance thresholds. Therefore, regional construction emissions related to Alternative 2A would not be cumulatively considerable, and impacts would be less than significant. With the elimination of the Sepulveda Boulevard BRT, localized construction emissions associated with construction of this improvement would not occur. However, localized construction emissions of particulate matter associated with the construction of other transportation improvements under this alternative would exceed SCAQMD thresholds. Therefore, localized construction emissions related to Alternative 2A would be cumulatively considerable. This would be a significant impact.

With the technology advances noted above, as with the Proposed Project, operation of the proposed transportation improvements under Alternative 2A would result in a decrease in emissions of the nonattainment pollutants PM10, PM2.5, and O_3 precursors (NOx and VOC) compared to existing conditions. Therefore, as with the Proposed Project, operational emissions associated with Alternative 2A would not be cumulatively considerable and this impact would be less than significant. However, by eliminating the Sepulveda Boulevard BRT, Alternative 2A would generate more operational emissions and contribute less towards eliminating the region's cumulative impacts than the Proposed Project.

Expose Sensitive Receptors to Substantial Pollutant Concentrations. As with the Proposed Project, construction of the Lincoln Boulevard Bridge Enhancement, the Lincoln Boulevard BRT, and the I-10 Ramp Reconfiguration at Bundy Drive would exceed SCAQMD's LSTs for particulate matter and the threshold for TACs. This would be a significant and unavoidable impact. However, in comparison with the Proposed Project, with elimination of the Sepulveda Boulevard BRT under Alternative 2A, significant and unavoidable impacts associated with pollutant concentrations and TAC emissions from construction of this improvement would not occur.

Relative to operations, as with the Proposed Project, under Alternative 2A, with the vehicle emission control technologies noted above, emissions of mobile source air toxics would be lower than existing conditions and impacts would be less than significant. Although impacts would be less than significant under Alternative 2A, with the elimination of BRT on Sepulveda Boulevard, VMT in the future under this alternative would be greater than under the Proposed Project and pollutant concentrations would be higher.

Objectionable Odors Affecting a Substantial Number of People. Similar to the Proposed Project, Alternative 2A would not create objectionable odors affecting a substantial number of people, and the impact would be less than significant.

6.7.2.2 Biological Resources

Adverse Effects on Sensitive Species, Sensitive Habitats, or Wetlands. Elimination of the Sepulveda BRT would not change the construction and operations impacts to biological resources associated with the Proposed Project. Construction of the Lincoln Boulevard Bridge Enhancement would result in significant but mitigable impacts to special-status species and habitat in the BWER. As with the Proposed Project, other proposed transportation improvements could result in the removal, trimming, or disturbance of street trees and ornamental landscaping that have the potential to support nesting migratory birds that are protected by the MBTA and the CFGC. Construction activities occurring within the nesting season would have the potential to result in the removal or destruction of an active nest or direct mortality or injury of individual birds. As with the Proposed Project, this is a potentially significant impact; with mitigation, this impact would be less than significant.

Adverse Effects on Migratory Species or Wildlife Corridors. Habitat within the project area is generally fragmented and of low value (e.g., ornamental landscaping) and does not provide viable linkages or migration corridors between habitat areas. However, as noted above, street trees within or immediately adjacent to right-of-ways could potentially support migratory birds. As with the Proposed Project, construction activities associated with Alternative 2A could result in the removal or destruction of an active nest or direct mortality or injury of individual birds. This would be a potentially significant impact; with mitigation, this impact would be less than significant.

6.7.2.3 Greenhouse Gas Emissions

Generation of GHG Emissions. As with the Proposed Project, construction of the proposed transportation improvements under Alternative 2A would result in temporary increases in GHG emissions, although Alternative 2A would have reduced construction-related GHG emissions compared to the Proposed Project as it would not include the construction of a center-running BRT on Sepulveda Boulevard. The 2012-2035 RTP/SCS estimated that construction emissions from all development activity in Los Angeles County would be approximately 0.2 percent of countywide GHG emissions in 2035 (SCAG, 2012). As with the Proposed Project, construction-related emissions associated with Alternative 2A would be a small portion of total construction emissions estimated in the 2012-2035 RTP/SCS, which themselves are expected to represent only 0.2 percent of countywide GHG emissions in 2035.

As with the Proposed Project, with background growth, Alternative 2A would result in higher total VMT compared to existing conditions. Although traffic volumes would be higher due to background growth, pollutants emissions from mobile sources are expected to be much lower due to technological advances in vehicle emission control, turnover in the vehicle fleet, and new emission standards. As a result, similar to the Proposed Project, under Alternative 2A, impacts related to GHG emissions associated with operations, combined with amortized construction-related GHG emissions, would be less than significant. However, with the elimination of BRT on Sepulveda Boulevard, VMT in the future under this alternative would be greater than under the Proposed Project and GHG emissions would be higher.

Impede Attainment of SCAG's per Capita Emission Reduction Targets. The Proposed Project is anticipated to reduce daily project area VMT by 3.4 percent as compared to future conditions without the Proposed Project and by 4.4 percent compared to existing conditions, with related decreases in GHG emissions. Without the Sepulveda Boulevard BRT, it is expected that total VMT and VMT per Capita would be greater under Alternative 2A than under the Proposed Project, with a comparative increase in GHG emissions. Nevertheless, Alternative 2A would still reduce VMT per Capita in the project area compared to existing and Future without Project conditions and would result in a reduction in daily VMT compared to the Future without Project scenario. Moreover, due to technological advances in vehicle emissions systems, projected turnover in the vehicle fleet, and future emission standards, GHG emissions associated with the Alternative 2A would be lower than existing conditions and slightly lower than Future without Project conditions. As the majority of the transportation improvements would still be implemented, Alternative 2A would advance the strategies provided in the 2012-2035 RTP/SCS to reach GHG emission reduction targets. Therefore, Alternative 2A would not impede attainment of SCAG's per Capita GHG emission reduction targets established in the 2012-2035 RTP/SCS and the impact would be less than significant.

Conflict with GHG Reduction Policies. As with the Proposed Project, the transportation improvements under Alternative 2A would increase mobility options, increase access to alternative modes of transportation, and reduce future transportation emissions. Per Capita GHG emissions under this alternative would be consistent with the 2012-2035 RTP/SCS regional CO_2 emission reduction targets and with SB 375. Without the Sepulveda Boulevard BRT, it is expected that total VMT and VMT per Capita would be greater under Alternative 2A than under the Proposed Project, with a comparative increase in GHG emissions. Nevertheless, Alternative 2A would still reduce VMT per Capita in the project area compared to existing and Future without Project conditions and would result in a reduction in daily VMT compared to the Future without Project scenario. Overall, Alternative 2A would be aligned with GHG reduction plans and policies contained in the 2012-2035 RTP/SCS, MP

2035, Plan for a Healthy Los Angeles, and Green LA Plan, although to a lesser degree than the Proposed Project.

6.7.2.4 Land Use and Planning

Division of a Community. Alternative 2A would eliminate construction-related access disruptions to land uses adjacent to the Sepulveda Boulevard BRT. However, similar to the Proposed Project, under this alternative, such disruptions would occur in other parts of the Specific Plan areas during construction of the other proposed transportation improvements. Due to their temporary and generally short-term nature, these impacts would be less than significant.

As with the Proposed Project, under Alternative 2A, transportation improvements would occur within or adjacent to existing right-of-ways, and would not alter the existing land use compatibility or create a barrier which could divide or isolate a community. With the elimination of the Sepulveda Boulevard BRT, there would be no loss in parking along this corridor, and no impacts to surrounding land uses associated with a loss of parking. However, as with the Proposed Project, parking loss in other parts of the Specific Plan areas would occur that could indirectly affect businesses. The change in parking availability would not cause a disruption of land uses that would constitute a significant land use impact. Therefore, as with the Proposed Project, Alternative 2A would not result in land use incompatibilities, or physically disrupt, divide, or isolate an existing neighborhood or community, and impacts would be less than significant.

Land Use Plan Consistency. With the elimination of the Sepulveda Boulevard BRT, Alternative 2A would not implement an important component of MP 2035 for the Westside and, as compared to the Proposed Project, would not be as well aligned with the 2012-2035 RTP/SCS. However, throughout the remainder of the Specific Plan areas, as with the Proposed Project, the mobility improvements under Alternative 2A would be consistent with regional and local adopted plans and policies.

As with the Proposed Project, construction of the transportation improvements under Alternative 2A would comply with existing City regulations governing construction, including prohibitions on roadway construction during peak hours. There are no policies in applicable land use plans that are directed at construction activities. Therefore, construction impacts would not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect and impacts would be less than significant.

6.7.2.5 Noise and Vibration

Expose Persons or Generate Excessive Noise Levels above Standards or Generate a Substantial Temporary or Permanent Increase in Ambient Noise Levels. As with the Proposed Project, under Alternative 2A, construction of transportation improvements would occur in proximity to sensitive receptors. These construction activities could generate noise levels up to 97 dBA at 50 feet. In many cases, construction of these improvements may occur over a period of just a few days in any one location; nevertheless, even with adherence to the LAMC, construction activities associated with Alternative 2A could exceed ambient noise levels by 5 dBA or more at a noise sensitive use for more than ten days in a three-month period and could exceed existing ambient noise levels by 10 dBA or more at a noise sensitive use for more than one day. In general, these impacts would be infrequent and of short duration and would only affect a small number of sensitive receptors. Nevertheless, as with the Proposed Project, this would be a significant and unavoidable impact, although Alternative 2B would eliminate noise impacts associated with the construction of the Sepulveda Boulevard BRT.

During operations, as with the Proposed Project, enhanced mobility under Alternative 2A may change vehicle speeds on some roadways, which could result in changes in noise levels. Decreased vehicle speeds could result in lower vehicle noise levels on some roadways during some periods compared to existing conditions, while increases in bus and private vehicle speeds on other roadways and/or during other time periods could result in higher vehicle noise levels compared to existing conditions. In addition, vehicle trips would increase in the study area due to background growth. Increased vehicle trips and speeds would not reach a level that would exceed noise standards; as a result, noise impacts from vehicular traffic would be less than significant.

Alternative 2A would result in the implementation of the same curb-running rapid buses and BRT on Lincoln Boulevard as the Proposed Project. As with the Proposed Project, curb-running rapid buses and BRT could increase noise levels at some sensitive land uses by more than 3 dBA. This would be a significant and unavoidable impact.

Generate Excessive Groundborne Vibration. Construction-related vibration impacts under Alternative 2A would be similar to the Proposed Project, except that Alternative 2A would not result in vibration impacts associate with construction of the Sepulveda Boulevard BRT. Similar to the Proposed Project, under Alternative 2A, construction activities associated with other transportation improvements would occur in proximity to nearby structures and sensitive receptors. Based on the typical construction equipment likely to be used during construction, it is not anticipated that construction activities would generate vibration that would adversely affect structures. However, construction activities could exceed the human annoyance vibration threshold for frequent events. Human annoyance impacts from vibration associated with the majority of construction activities would be infrequent and of short duration and would only affect a small number of sensitive receptors. Moreover, implementation of recommended mitigation measures would reduce human annoyance impacts associated with vibration to the extent feasible. Nevertheless, even with mitigation, vibration at some locations would be a significant and unavoidable impact. As with the Proposed Project, under Alternative 2A, operational vibration impacts from vehicular traffic would be less than significant.

Expose People Within Proximity to Airports to Excessive Noise Levels. As with the Proposed Project, construction of transportation improvements associated with Alternative 2A would not expose construction workers to excessive airport-related noise levels. Therefore, impacts would be less than significant.

Land uses in the project area would not change under Alternative 2A. Therefore, the project would not expose residents to excessive airport-related noise and no operational impact would occur.

6.7.2.6 Transportation

Conflict with Transportation Policies, Plans, or Programs. Overall, Alternative 2A would be consistent with applicable regional and local adopted plans and policies. As with the Proposed Project, impacts relating to consistency with adopted policies, plans, and programs under Alternative 2A would be less than significant. Compared to the Proposed Project, Alternative 2A would generate more auto travel along Sepulveda Boulevard due to the increased vehicle capacity and lack of BRT service and, therefore, would be less consistent with adopted transportation policies, plans, and programs that promote multimodal travel.

Exceed Thresholds for Roadway Operations on the Vehicular Circulation System. Alternative 2A would implement the proposed transportation improvements, with the exception of the Sepulveda Boulevard BRT. While traffic operations on Sepulveda Boulevard would likely result in fewer LOS

impacts without the implementation of BRT service, overall congestion in the Specific Plan areas would still be expected to increase under Alternative 2A in comparison to existing conditions due to background growth. On a regional level, traffic in the study area is anticipated to increase in conjunction with regional population, housing, and employment growth projected to occur in the future. This growth will occur with or without implementation of Alternative 2A. The background growth influences the transportation analysis by accounting for the increased activity levels under Future with Alternative 2A conditions. Consequently, when comparing traffic operations under Future with Alternative 2A conditions to existing conditions, peak period congestion would be expected to continue to increase. As with the Proposed Project, impacts relating to roadway operations on the vehicular circulation system under Alternative 2A would be significant and unavoidable. Compared to the Proposed Project, Alternative 2A would maintain existing roadway capacity along Sepulveda Boulevard, which has the potential to result in slightly lesser impacts to vehicle operations along this corridor as compared to the Proposed Project. However, it is expected that background growth would result in similar congestion levels along the corridor in the long-term as compared to the Proposed Project. As a result, although it is possible that impacts to vehicle operations under Alternative 2A could be less than the Proposed Project, it is expected that these impacts would likely be similar to the Proposed Project.

Consideration of New Potential Metrics. Alternative 2A would implement the proposed transportation improvements, with the exception of the Sepulveda Boulevard BRT. The Proposed Project benefits of distributing travelers across all modes of transportation (mode split) would not be realized to the same extent under Alternative 2A due to the lack of the Sepulveda BRT to serve activity centers and east-west transit lines, and transit ridership would not increase to the levels envisioned with the Proposed Project. The implementation of the other projects on the updated project lists would continue to improve mode split and continue to result in a decrease in VMT and VMT per Capita in comparison to Future without Project conditions. The mode split improvements and the associated reductions in VMT would help to meet the State's goals of reducing greenhouse gas emissions, as mandated by AB 32 and SB 375. In addition, these performance indicators are potential metrics for evaluating transportation impacts that may be included in future revisions to City's L.A. CEQA Thresholds Guide. While the City of Los Angeles has not yet developed thresholds for these metric, Alternative 2A would result in an increase in mode shares for transit, biking and walking and a decrease in VMT in comparison to Future without Project conditions. Given this conclusion, Alternative 2A would not result in a significant adverse transportation impact under these potential new CEQA metrics.

Exceed Thresholds for Neighborhood Traffic Intrusion. Alternative 2A would implement the proposed transportation improvements, with the exception of the Sepulveda Boulevard BRT. While traffic operations on Sepulveda Boulevard could be marginally better without the implementation of BRT service, overall congestion in the Specific Plan areas would still be expected to increase under Alternative 2A compared to existing conditions and would not be substantially different from the Proposed Project. Along roadways where Alternative 2A would cause significant traffic congestion, diversion of trips could occur onto adjacent parallel routes. It is anticipated that diversion would not occur on streets that operate at LOS D or better during peak periods because the average delay is not substantial. However, for the street segments where the LOS would degrade from D to E or F, some trips could divert to adjacent streets to avoid longer travel times through congested locations. On a regional level, traffic in the study area is anticipated to increase in conjunction with regional population, housing, and employment growth projected to occur in the future. This growth will occur with or without implementation of Alternative 2A. The background growth influences the

transportation analysis by accounting for the increased activity levels under Future with Alternative 2A conditions. Consequently, when comparing neighborhood traffic intrusion under Future with Alternative 2A conditions to existing conditions, traffic intrusion would be expected to continue to increase. As with the Proposed Project, impacts relating to neighborhood traffic intrusion under Alternative 2A would be significant and unavoidable. Compared to the Proposed Project, Alternative 2A would maintain the existing roadway capacity along Sepulveda Boulevard, which could result in fewer vehicles diverting to neighborhood streets. However, it is expected that background growth would result in similar congestion levels along the corridor in the long-term and the impact to neighborhood traffic intrusion would likely be similar to the Proposed Project.

Exceed Thresholds for CMP and State Freeway Facilities. Alternative 2A would implement the proposed transportation improvements, with the exception of the Sepulveda Boulevard BRT. While traffic operations on Sepulveda Boulevard could be marginally better without the implementation of BRT service, overall congestion in the Specific Plan areas would still be expected to increase under Alternative 2A compared to existing conditions and would not be substantially different from the Proposed Project. On a regional level, traffic in the study area is anticipated to increase in conjunction with regional population, housing, and employment growth projected to occur in the future. This growth will occur with or without implementation of Alternative 2A. The background growth influences the transportation analysis by accounting for the increased activity levels under Future with Alternative 2A conditions. Consequently, when comparing traffic operations on CMP and state freeway facilities under Future with Alternative 2A conditions to existing conditions, congestion would be expected to continue to increase. As with the Proposed Project, impacts relating to CMP and state freeway facilities under Alternative 2A would be significant and unavoidable. Compared to the Proposed Project, the Alternative 2A would result in similar impacts to CMP and state freeway facilities.

Adversely Affect Fire Protection Services/Emergency Access. Based on the City's adopted threshold of significance, Alternative 2A would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. LAFD is responsible for public safety and must respond to changing circumstances and therefore would act to maintain response times. The steps that LAFD would have to take to maintain public safety are not reasonably foreseeable at this time. Options available to LAFD include expanding the Fire Preemption System, increasing staffing levels, and adding new fire stations(s) to underserved areas. The potential for new fire station construction is speculative at the present time and is therefore not analyzed as part of Alternative 2A. Depending on the location of new fire protection facilities, operational impacts (primarily noise) could occur; however, such impacts are unforeseeable at this time. As with the Proposed Project, impacts relating to emergency access under Alternative 2A would be less than significant.

Disrupt Public Transit, Bicycle, or Pedestrian Facilities. Overall, Alternative 2A would not disrupt existing public transit, bicycle, or pedestrian facilities or interfere with planned facilities. As with the Proposed Project, impacts relating to the disruption to existing public transit, bicycle, or pedestrian facilities or interference with planned facilities under Alternative 2A would be less than significant. Compared to the Proposed Project, Alternative 2A would result in fewer high capacity transit services and would be less compatible with existing public transit, bicycle, or pedestrian facilities and planned facilities compared to the Proposed Project.

Substantially Change Transportation Safety. None of the transportation system improvements under Alternative 2A would introduce new safety hazards at intersections or along roadway segments, as most would be designed to improve safety for all roadway users. As with the Proposed Project, impacts relating to transportation safety would be less than significant.

Construction Activities on Major Corridors. Implementation of transportation improvements under Alternative 2A would mostly consist of roadway restriping and limited changes to the physical configuration of curbs, and thus, would likely be short in duration (lasting up to a few weeks), while other projects, such as the Lincoln Boulevard Bridge Enhancement, I-10 Ramp Reconfiguration at Bundy Drive, and center-running BRT on Lincoln Boulevard, would require longer construction duration. Without the Sepulveda BRT, no construction-related impacts would occur along Sepulveda Boulevard; however, the other temporary construction-related impacts would occur. As with the Proposed Project, temporary construction impacts would be significant and unavoidable.

Parking. Parking deficits are considered to be social effects, rather than impacts on the physical environment as defined by CEQA. While a project's social impacts need not be treated as significant impacts on the environment, the secondary physical impacts that would be triggered by a social impact must be addressed. Some of the transportation projects contained in Alternative 2A have the potential to remove on-street parking in certain locations while others provide parking solutions. For the purpose of analyzing potential impacts at a programmatic level, assumptions needed to be made as to how the projects could be implemented based on conceptual designs. For example, it was assumed that the Lincoln Boulevard center-running BRT project would remove parking from one side of the street along the corridor and from both sides of the street at station locations. However, it is not certain that parking would be removed for this project as the corridor would need to be studied in further detail before any improvements are implemented. Through these additional studies, it may be found that on-street parking should be maintained in exchange for a reduction in vehicle capacity (i.e., vehicle travel lane conversions to bus-only lanes) or other off-street parking solutions required in certain locations along the corridor may be proposed. Individual projects would be studied in further detail as the Proposed Project would not, itself, entitle or otherwise approve any transportation projects. Based on this, it is speculative at this time to conclude that any particular parking would be removed under Alternative 2A. As with the Proposed Project, traffic impacts related to parking under Alternative 2A would be less than significant.

6.7.3 Alternative 2B – No Lincoln Boulevard BRT

Under Alternative 2B, the proposed BRT on Lincoln Boulevard would be eliminated from the Proposed Project's transportation improvement lists. All other transportation improvements associated with the Proposed Project, including the Lincoln Boulevard Bridge Enhancement project, are included in this alternative. As compared to the Proposed Project, Alternative 2B would maintain current vehicle capacity along Lincoln Boulevard and add vehicle capacity in the area near the bridge. Alternative 2B would not provide an alternate dedicated north/south transit lane to serve the Westside and connect to existing and planned east/west transit. Alternative 2B would have comparatively more vehicle capacity along Lincoln Boulevard but less transit capacity along this corridor and fewer multimodal connections to intersecting corridors. Alternative 2B assumes that the combination of lower transit capacity and greater vehicle capacity along this corridor would result in more VMT in the study area as compared to the Proposed Project. Alternative 2B would also result in slightly less construction activity along Lincoln Boulevard. The following analysis discusses the potential impacts associated with Alternative 2B compared to those of the Proposed Project.

6.7.3.1 Air Quality

Conflict with Air Quality Plans. As with the Proposed Project, Alternative 2B would not result in any alterations in land use in the project area and would not affect future regional development anticipated in the 2012-2035 RTP/SCS or incorporated as assumptions in the AQMP. Overall, Alternative 2B would improve mobility in the Westside by providing transportation options and conditions that would promote use of alternative forms of transportation, including public transit, bicycles and walking. However, elimination of the Lincoln Boulevard BRT would not provide transit options on Lincoln Boulevard, which is a major transportation corridor in the project area.

The purpose of the 2012 AQMP is to provide updated air pollution control strategies to bring the SoCAB into compliance with federal ambient air quality standards. The AQMP relies upon a number of strategies to meet the federal ambient air quality standards, including promotion of a sustainable transportation system that emphasizes transit and non-motorized transportation and that increases multimodal mobility and minimizes VMT. These goals are also reflected in the 2012-2035 RTP/SCS, the City of Los Angeles Air Quality Element, and MP 2035. The Proposed Project is anticipated to reduce daily project area VMT by 3.4 percent as compared to future conditions without the Proposed Project. Per capita VMT would decrease by 4.4 percent compared to existing conditions and by 3.4 percent compared to Future without Project conditions. Without the Lincoln Boulevard BRT, it is expected that total VMT and VMT per Capita would be greater under Alternative 2B than under the Proposed Project, with a comparative increase in air emissions. Nevertheless, Alternative 2B would still reduce VMT per Capita in the project area compared to existing and Future without Project conditions and would result in a reduction in daily VMT compared to the Future without Project scenario. Overall, Alternative 2B would be aligned with the 2012-2035 RTP/SCS as well as relevant air quality policy objectives of the City's Air Quality Element, Plan for a Healthy Los Angeles, and MP 2035, although to a lesser degree than the Proposed Project.

Violate Air Quality Standards. Alternative 2B would have reduced construction emissions compared to the Proposed Project as it would not include a center-running BRT on Lincoln Boulevard. As with the Proposed Project, construction emissions under Alternative 2B would not exceed SCAQMD thresholds, and construction impacts would not conflict with or obstruct implementation of the AQMP. Therefore, as with the Proposed Project, Alternative 2B would not result in a significant impact related to air quality standards.

With background growth, Alternative 2B would result in higher total VMT compared to existing conditions. Although traffic volumes would be higher due to background growth, pollutant emissions from mobile sources are expected to be much lower due to technological advances in vehicle emission control, turnover in the vehicle fleet, and new emission standards. As a result, similar to the Proposed Project, emissions under this alternative would not exceed the SCAQMD significance thresholds. Although emissions would be less than significant under Alternative 2B, with the elimination of BRT on Lincoln Boulevard, VMT in the future under this alternative would be greater than under the Proposed Project and emissions would be higher.

Cumulatively Considerable Increase in Criteria Pollutants. As noted above, with the elimination of the Lincoln Boulevard BRT, regional construction emissions under Alternative 2B would be lower than those associated with the Proposed Project. Under both Alternative 2B and the Proposed Project, regional construction emissions of the nonattainment pollutants (PM10, PM2.5, and O_3 precursors [NOx and VOC]) would be less than the SCAQMD significance thresholds. Therefore, regional construction emissions related to Alternative 2B would not be cumulatively considerable, and impacts

would be less than significant. With the elimination of the Lincoln Boulevard BRT, localized construction emissions associated with construction of this improvement would not occur. However, localized construction emissions of particulate matter associated with the construction of other transportation improvements under this alternative would exceed SCAQMD thresholds. Therefore, localized construction emissions related to Alternative 2B would be cumulatively considerable. This would be a significant impact.

With the technology advances noted above, as with the Proposed Project, operation of the proposed transportation improvements under Alternative 2B would result in a decrease in emissions of the nonattainment pollutants PM10, PM2.5, and O_3 precursors (NOx and VOC) compared to existing conditions. Therefore, as with the Proposed Project, operational emissions associated with Alternative 2B would not be cumulatively considerable and this impact would be less than significant. However, by eliminating the Lincoln Boulevard BRT, Alternative 2B would generate more operational emissions and contribute less towards eliminating the region's cumulative impacts than the Proposed Project.

Expose Sensitive Receptors to Substantial Pollutant Concentrations. As with the Proposed Project, construction of the Lincoln Boulevard Bridge Enhancement, the Sepulveda Boulevard BRT, and the I-10 Ramp Reconfiguration at Bundy Drive would exceed SCAQMD's LSTs for particulate matter and the threshold for TACs. This would be a significant and unavoidable impact. However, in comparison with the Proposed Project, with elimination of the Lincoln Boulevard BRT under Alternative 2A, significant and unavoidable impacts associated with pollutant concentrations and TAC emissions from construction of this improvement would not occur.

Relative to operations, as with the Proposed Project, under Alternative 2B, with the vehicle emission control technologies noted above, emissions of mobile source air toxics would be lower than existing conditions and impacts would be less than significant. Although impacts would be less than significant under Alternative 2B, with the elimination of BRT on Lincoln Boulevard, VMT in the future under this alternative would be greater than under the Proposed Project and pollutant concentrations would be higher.

Objectionable Odors Affecting a Substantial Number of People. Similar to the Proposed Project, Alternative 2B would not create objectionable odors affecting a substantial number of people, and the impact would be less than significant.

6.7.3.2 Biological Resources

Adverse Effects on Sensitive Species, Sensitive Habitats, or Wetlands. Although it would eliminate the Lincoln Boulevard BRT, Alternative 2B would still include enhancements to the Lincoln Boulevard Bridge, including widening Lincoln Boulevard north and south of the bridge and widening or replacing the bridge itself, in order to relieve the current bottleneck the bridge creates and provide active transportation improvements (such as bike facilities and sidewalks). Therefore, the construction and operations related impacts to biological resources under Alternative 2B would be the same as for the Proposed Project. Construction of the Lincoln Boulevard Bridge Enhancement would result in significant but mitigable impacts to special-status species and habitat in the BWER. As with the Proposed Project, other proposed transportation improvements could result in the removal, trimming, or disturbance of street trees and ornamental landscaping that have the potential to support nesting migratory birds that are protected by the MBTA and the CFGC. Construction activities occurring within the nesting season would have the potential to result in the removal or destruction of an active nest or

direct mortality or injury of individual birds. As with the Proposed Project, this is a potentially significant impact; with mitigation, this impact would be less than significant.

Adverse Effects on Migratory Species or Wildlife Corridors. Habitat within the project area is generally fragmented and of low value (e.g., ornamental landscaping) and does not provide viable linkages or migration corridors between habitat areas. However, as noted above, street trees within or immediately adjacent to right-of-ways could potentially support migratory birds. As with the Proposed Project, construction activities associated with Alternative 2B could result in the removal or destruction of an active nest or direct mortality or injury of individual birds. This would be a potentially significant impact; with mitigation, this impact would be less than significant.

6.7.3.3 Greenhouse Gas Emissions

Generation of GHG Emissions. As with the Proposed Project, construction of the proposed transportation improvements under Alternative 2B would result in temporary increases in GHG emissions, although Alternative 2B would have reduced construction-related GHG emissions compared to the Proposed Project as it would not include a center-running BRT on Lincoln Boulevard. The 2012-2035 RTP/SCS estimated that construction emissions from all development activity in Los Angeles County would be approximately 0.2 percent of countywide GHG emissions in 2035 (SCAG, 2012). As with the Proposed Project, construction-related emissions associated with Alternative 2B would be a small portion of total construction emissions estimated in the 2012-2035 RTP/SCS, which themselves are expected to represent only 0.2 percent of countywide GHG emissions in 2035.

As with the Proposed Project, with background growth, Alternative 2B would result in higher total VMT compared to existing conditions. Although traffic volumes would be higher due to background growth, pollutants emissions from mobile sources are expected to be much lower due to technological advances in vehicle emission control, turnover in the vehicle fleet, and new emission standards. As a result, similar to the Proposed Project, under Alternative 2B, impacts related to GHG emissions associated with operations, combined with amortized construction-related GHG emissions, would be less than significant. However, with the elimination of BRT on Lincoln Boulevard, VMT in the future under this alternative would be greater than under the Proposed Project and GHG emissions would be higher.

Impede Attainment of SCAG's per Capita Emission Reduction Targets. The Proposed Project is anticipated to reduce daily project area VMT by 3.4 percent as compared to future conditions without the Proposed Project and by 4.4 percent compared to existing conditions, with related decreases in GHG emissions. Without the Lincoln Boulevard BRT, it is expected that total VMT and VMT per Capita would be greater under Alternative 2B than under the Proposed Project, with a comparative increase in GHG emissions. Nevertheless, Alternative 2B would still reduce VMT per Capita in the project area compared to existing and Future without Project conditions and would result in a reduction in daily VMT compared to the Future without Project scenario. Moreover, due to technological advances in vehicle emissions systems, projected turnover in the vehicle fleet, and future emission standards, GHG emissions associated with the Alternative 2B would be lower than existing conditions and slightly lower than Future without Project conditions. As the majority of the transportation improvements would still be implemented, Alternative 2B would advance the strategies provided in the 2012-2035 RTP/SCS to reach GHG emission reduction targets. Therefore, Alternative 2B would not impede attainment of SCAG's per Capita GHG emission reduction targets established in the 2012-2035 RTP/SCS and the impact would be less than significant.

Conflict with GHG Reduction Policies. As with the Proposed Project, the transportation improvements under Alternative 2B would increase mobility options, increase access to alternative modes of transportation, and reduce future transportation emissions. Per Capita GHG emissions under this alternative would be consistent with the 2012-2035 RTP/SCS regional CO_2 emission reduction targets and with SB 375. Without the Lincoln Boulevard BRT, it is expected that total VMT would be greater under Alternative 2B than under the Proposed Project, with a comparative increase in GHG emissions. Nevertheless, Alternative 2B would still reduce VMT per Capita in the project area compared to existing and Future without Project conditions and would result in a reduction in daily VMT compared to the Future without Project scenario. Overall, Alternative 2B would be aligned with GHG reduction plans and policies contained in the 2012-2035 RTP/SCS, MP 2035, Plan for a Healthy Los Angeles, and Green LA Plan, although to a lesser degree than the Proposed Project.

6.7.3.4 Land Use and Planning

Division of a Community. Alternative 2B would eliminate construction-related access disruptions to land uses adjacent to the Lincoln Boulevard BRT. However, similar to the Proposed Project, under this alternative, such disruptions would occur in other parts of the Specific Plan areas during construction of the other proposed transportation improvements. Due to their temporary and generally short-term nature, these impacts would be less than significant.

As with the Proposed Project, under Alternative 2B, transportation improvements would occur within or adjacent to existing right-of-ways, and would not alter the existing land use compatibility or create a barrier which could divide or isolate a community. With the elimination of the Lincoln Boulevard BRT, there would be no loss in parking along this corridor, and no impacts to surrounding land uses associated with a loss of parking. However, as with the Proposed Project, parking loss in other parts of the Specific Plan areas would occur that could indirectly affect businesses. The change in parking availability would not cause a disruption of land uses that would constitute a significant land use impact. Therefore, as with the Proposed Project, Alternative 2B would not result in land use incompatibilities, or physically disrupt, divide, or isolate an existing neighborhood or community, and impacts would be less than significant.

Land Use Plan Consistency. With the elimination of the Lincoln Boulevard BRT, Alternative 2B would not implement an important component of MP 2035 for the Westside and, as compared to the Proposed Project, would not be as well aligned with the 2012-2035 RTP/SCS. However, throughout the remainder of the Specific Plan areas, as with the Proposed Project, the mobility improvements under Alternative 2B would be consistent with regional and local adopted plans and policies.

As with the Proposed Project, construction of the transportation improvements under Alternative 2B would comply with existing City regulations governing construction, including prohibitions on roadway construction during peak hours. There are no policies in applicable land use plans that are directed at construction activities. Therefore, construction impacts would not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect and impacts would be less than significant.

6.7.3.5 Noise and Vibration

Expose Persons or Generate Excessive Noise Levels above Standards or Generate a Substantial Temporary or Permanent Increase in Ambient Noise Levels. As with the Proposed Project, under Alternative 2B, construction of transportation improvements would occur in proximity to sensitive receptors. These construction activities could generate noise levels up to 97 dBA at 50 feet. In many

cases, construction of these improvements may occur over a period of just a few days in any one location; nevertheless, even with adherence to the LAMC, construction activities associated with Alternative 2B could exceed ambient noise levels by 5 dBA or more at a noise sensitive use for more than ten days in a three-month period and could exceed existing ambient noise levels by 10 dBA or more at a noise sensitive use for more than one day. In general, these impacts would be infrequent and of short duration and would only affect a small number of sensitive receptors. Nevertheless, as with the Proposed Project, this would be a significant and unavoidable impact, although Alternative 2B would eliminate noise impacts associated with the construction of the Lincoln Boulevard BRT.

During operations, as with the Proposed Project, enhanced mobility under Alternative 2B may change vehicle speeds on some roadways, which could result in changes in noise levels. Decreased vehicle speeds could result in lower vehicle noise levels on some roadways during some periods compared to existing conditions, while increases in bus and private vehicle speeds on other roadways and/or during other time periods could result in higher vehicle noise levels compared to existing conditions. In addition, vehicle trips would increase in the study area due to background growth. Increased vehicle trips and speeds would not reach a level that would exceed noise standards; as a result, noise impacts from vehicular traffic would be less than significant.

Alternative 2B would result in the implementation of the same curb-running rapid buses and BRT on Sepulveda Boulevard as the Proposed Project. As with the Proposed Project curb-running rapid buses and BRT could increase noise levels at some sensitive land uses by more than 3 dBA. This would be a significant and unavoidable impact.

Generate Excessive Groundborne Vibration. Construction-related vibration impacts under Alternative 2B would be similar to the Proposed Project, except that Alternative 2B would not result in vibration impacts associate with construction of the Lincoln Boulevard BRT. Similar to the Proposed Project, under Alternative 2A, construction activities associated with other transportation improvements would occur in proximity to nearby structures and sensitive receptors. Based on the typical construction equipment likely to be used during construction, it is not anticipated that construction activities would generate vibration that would adversely affect structures. However, construction activities could exceed the human annoyance vibration threshold for frequent events. Human annoyance impacts from vibration associated with the majority of construction activities would be infrequent and of short duration and would only affect a small number of sensitive receptors. Moreover, implementation of recommended mitigation measures would reduce human annoyance impacts associated with vibration to the extent feasible. Nevertheless, even with mitigation, vibration at some locations would be a significant and unavoidable impact. As with the Proposed Project, under Alternative 2B, operational vibration impacts from vehicular traffic would be less than significant.

Expose People Within Proximity to Airports to Excessive Noise Levels. As with the Proposed Project, construction of transportation improvements associated with Alternative 2B would not expose construction workers to excessive airport-related noise levels. Therefore, impacts would be less than significant.

Land uses in the project area would not change under Alternative 2B. Therefore, the project would not expose residents to excessive airport-related noise and no operational impact would occur.

6.7.3.6 Transportation

Conflict with Transportation Policies, Plans, or Programs. Overall, Alternative 2B would be consistent with applicable regional and local adopted plans and policies. As with the Proposed Project, impacts relating to consistency with adopted policies, plans, and programs under Alternative 2B would be less than significant. Compared to the Proposed Project, Alternative 2B would generate more auto travel along Lincoln Boulevard due to the increased vehicle capacity and lack of BRT service and, therefore, would be less consistent with adopted transportation policies, plans, and programs that promote multimodal travel.

Exceed Thresholds for Roadway Operations on the Vehicular Circulation System. Alternative 2B would implement the proposed transportation improvements, with the exception of the Lincoln Boulevard BRT. While traffic operations on Lincoln Boulevard would likely result in fewer LOS impacts without the implementation of BRT service, overall congestion in the Specific Plan areas would still be expected to increase under Alternative 2B in comparison to existing conditions due to background growth. On a regional level, traffic in the study area is anticipated to increase in conjunction with regional population, housing, and employment growth projected to occur in the future. This growth will occur with or without implementation of Alternative 2B. The background growth influences the transportation analysis by accounting for the increased activity levels under Future with Alternative 2B conditions. Consequently, when comparing traffic operations under Future with Alternative 2B conditions to existing conditions, peak period congestion would be expected to continue to increase. As with the Proposed Project, impacts relating to roadway operations on the vehicular circulation system under Alternative 2B would be significant and unavoidable. Compared to the Proposed Project, Alternative 2B would maintain existing roadway capacity along Lincoln Boulevard, which has the potential to result in slightly lesser impacts to vehicle operations along this corridor as compared to the Proposed Project. However, it is expected that background growth would result in similar congestion levels along the corridor in the long-term as compared to the Proposed Project. As a result, although it is possible that impacts to vehicle operations under Alternative 2B could be less than the Proposed Project, it is expected that these impacts would likely be similar to the Proposed Project.

Consideration of New Potential Metrics. Alternative 2B would implement the proposed transportation improvements, with the exception of the Lincoln Boulevard BRT. The Proposed Project benefits of distributing travelers across all modes of transportation (mode split) would not be realized to the same extent under Alternative 2B due to the lack of the Lincoln BRT to serve activity centers and east-west transit lines, and transit ridership would not increase to the levels envisioned with the Proposed Project. The implementation of the other projects on the updated project lists would continue to improve mode split and continue to result in a decrease in VMT and VMT per Capita in comparison to Future without Project conditions. The mode split improvements and the associated reductions in VMT would help to meet the State's goals of reducing greenhouse gas emissions, as mandated by AB 32 and SB 375. In addition, these performance indicators are potential metrics for evaluating transportation impacts that may be included in future revisions to City's L.A. CEQA Thresholds Guide. While the City of Los Angeles has not yet developed thresholds for these metrics, Alternative 2B would result in an increase in mode shares for transit, biking and walking and a decrease in VMT in comparison to Future without Project conditions. Given this conclusion, Alternative 2B would not result in a significant adverse transportation impact under these potential new CEQA metrics.

Exceed Thresholds for Neighborhood Traffic Intrusion. Alternative 2B would implement the proposed transportation improvements, with the exception of the Lincoln Boulevard BRT. While traffic operations on Lincoln Boulevard could be marginally better without the implementation of BRT service, overall congestion in the Specific Plan areas would still be expected to increase under Alternative 2B compared to existing conditions and would not be substantially different from the Proposed Project. Along roadways where Alternative 2B would cause significant traffic congestion, diversion of trips could occur onto adjacent parallel routes. It is anticipated that diversion would not occur on streets that operate at LOS D or better during peak periods because the average delay is not substantial. However, for the street segments where the LOS would degrade from D to E or F, some trips could divert to adjacent streets to avoid longer travel times through congested locations. On a regional level, traffic in the study area is anticipated to increase in conjunction with regional population, housing, and employment growth projected to occur in the future. This growth will occur with or without implementation of Alternative 2B. The background growth influences the transportation analysis by accounting for the increased activity levels under Future with Alternative 2B conditions. Consequently, when comparing neighborhood traffic intrusion under Future with Alternative 2B conditions to existing conditions, traffic intrusion would be expected to continue to increase. As with the Proposed Project, impacts relating to neighborhood traffic intrusion under Alternative 2B would be significant and unavoidable. Compared to the Proposed Project, Alternative 2B would maintain the existing roadway capacity along Lincoln Boulevard, which could result in fewer vehicles diverting to neighborhood streets. However, it is expected that background growth would result in similar congestion levels along the corridor in the long-term and the impact to neighborhood traffic intrusion would likely be similar to the Proposed Project.

Exceed Thresholds for CMP and State Freeway Facilities. Alternative 2B would implement the proposed transportation improvements, with the exception of the Lincoln Boulevard BRT. While traffic operations on Lincoln Boulevard could be marginally better without the implementation of BRT service, overall congestion in the Specific Plan areas would still be expected to increase under Alternative 2B compared to existing conditions and would not be substantially different from the Proposed Project. On a regional level, traffic in the study area is anticipated to increase in conjunction with regional population, housing, and employment growth projected to occur in the future. This growth will occur with or without implementation of Alternative 2B. The background growth influences the transportation analysis by accounting for the increased activity levels under Future with Alternative 2B conditions. Consequently, when comparing traffic operations on CMP and state freeway facilities under Future with Alternative 2B conditions to existing conditions, congestion would be expected to continue to increase. As with the Proposed Project, impacts relating to CMP and state freeway facilities under Alternative 2B would be significant and unavoidable. Compared to the Proposed Project, the Alternative 2B would result in similar impacts to CMP and state freeway facilities.

Adversely Affect Fire Protection Services/Emergency Access. Based on the City's adopted threshold of significance, Alternative 2B would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. LAFD is responsible for public safety and must respond to changing circumstances and therefore would act to maintain response times. The steps that LAFD would have to take to maintain public safety are not reasonably foreseeable at this time. Options available to LAFD include expanding the Fire Preemption System, increasing staffing levels, and adding new fire stations(s) to underserved areas. The potential for new fire station construction is speculative at the present time and is therefore not analyzed as part of Alternative 2B. Depending on the location of new fire protection facilities, operational impacts

(primarily noise) could occur; however, such impacts are unforeseeable at this time. As with the Proposed Project, impacts relating to emergency access under Alternative 2B would be less than significant.

Disrupt Public Transit, Bicycle, or Pedestrian Facilities. Overall, Alternative 2B would not disrupt existing public transit, bicycle, or pedestrian facilities or interfere with planned facilities. As with the Proposed Project, impacts relating to the disruption to existing public transit, bicycle, or pedestrian facilities or interference with planned facilities under Alternative 2B would be less than significant. Compared to the Proposed Project, Alternative 2B would result in fewer high capacity transit services and would be less compatible with existing public transit, bicycle, or pedestrian facilities and planned facilities compared to the Proposed Project.

Substantially Change Transportation Safety. None of the transportation system improvements under Alternative 2B would introduce new safety hazards at intersections or along roadway segments, as most would be designed to improve safety for all roadway users. As with the Proposed Project, impacts relating to transportation safety would be less than significant.

Construction Activities on Major Corridors. Implementation of transportation improvements under Alternative 2B would mostly consist of roadway restriping and limited changes to the physical configuration of curbs, and thus, would likely be short in duration (lasting up to a few weeks) while other projects, such as the Lincoln Boulevard Bridge Enhancement, I-10 Ramp Reconfiguration at Bundy Drive, and center-running BRT on Sepulveda Boulevard, would require longer construction duration. Without the Lincoln BRT, no construction-related impacts would occur along the majority of Lincoln Boulevard (except between Fiji Way and Jefferson Boulevard for the bridge improvements over the Ballona Creek); however, the other temporary construction-related impacts would occur. As with the Proposed Project, temporary construction impacts would be significant and unavoidable.

Parking. Parking deficits are considered to be social effects, rather than impacts on the physical environment as defined by CEQA. While a project's social impacts need not be treated as significant impacts on the environment, the secondary physical impacts that would be triggered by a social impact must be addressed. Some of the transportation projects contained in Alternative 2B have the potential to remove on-street parking in certain locations while others provide parking solutions. For the purpose of analyzing potential impacts at a programmatic level, assumptions needed to be made as to how the projects could be implemented based on conceptual designs. For example, it was assumed that the Sepulveda Boulevard center-running BRT project would remove parking from one side of the street along the corridor and from both sides of the street at station locations. However, it is not certain that parking would be removed for this project as the corridor would need to be studied in further detail before any improvements are implemented. Through these additional studies, it may be found that on-street parking should be maintained in exchange for a reduction in vehicle capacity (i.e., vehicle travel lane conversions to bus-only lanes) or other off-street parking solutions required in certain locations along the corridor may be proposed. Individual projects would be studied in further detail as the Proposed Project would not, itself, entitle or otherwise approve any transportation projects. Based on this, it is speculative at this time to conclude that any particular parking would be removed under Alternative 2B. As with the Proposed Project, traffic impacts related to parking under Alternative 2B would be less than significant.

6.7.4 Alternative 3A – Reduced Parking

All transportation improvements associated with the Proposed Project are included in this alternative. This alternative offers a distinction on how right-of-way is utilized for the proposed transportation improvements. Under this alternative, as with the Proposed Project, the majority of the proposed transportation improvements would be achieved within existing roadway right-of-ways. Under the Proposed Project, it is assumed that when additional right-of-way capacity for projects (such as BRT and bicycle facilities) is needed, it would be provided through a combination of vehicular capacity reductions (lane conversions) along with on-street parking removal. Under this alternative, the Reduced Parking Alternative, when additional right-of-way is required, it would be provided solely by removing street parking, where such parking is available, with no conversion of vehicle travel lanes. Most roadways within the Specific Plan area currently have on-street parking. However, on-street parking restrictions in which the parking lane becomes a vehicular travel lane to provide additional vehicle capacity are common during the morning and afternoon peak commute hours. Typically, the parking restriction on a roadway segment occurs only during the morning or afternoon peak hours depending on the directionality of vehicle flows (e.g., westbound vehicle demand is higher in the morning and eastbound vehicle demand is higher in the afternoon).

The physical distinctions between Alternative 3A and the Proposed Project are minimal, as right-of-way reallocation for transportation improvements would only be necessary on select roadway segments. Under this alternative, as compared to the Proposed Project, there would be marginally greater vehicle capacity and slightly fewer on-street parking spaces on select roadway segments. Overall, VMT in the study area would be similar to the Proposed Project. The following analysis discusses the potential impacts associated with the greater vehicle capacity and loss of parking under Alternative 3A compared to those of the Proposed Project.

6.7.4.1 Air Quality

Conflict with Air Quality Plans. Although Alternative 3A would alter the method for implementing transportation improvements in the study area (i.e., by removal of vehicle travel lanes to provide additional right-of-way for transit or bicycle facilities), the list of transportation improvements that would be implemented would not change. Therefore, as with the Proposed Project, Alternative 3A would not result in any alterations in land use in the project area and would not affect future regional development anticipated in the 2012-2035 RTP/SCS or incorporated as assumptions in the AQMP. Alternative 3A would improve mobility in the Westside by providing more transportation options and conditions that would promote use of alternative forms of transportation, including public transit, bicycles and walking.

The purpose of the 2012 AQMP is to provide updated air pollution control strategies to bring the SoCAB into compliance with federal ambient air quality standards. The AQMP relies upon a number of strategies to meet the federal ambient air quality standards, including promotion of a sustainable transportation system that emphasizes transit and non-motorized transportation and that increases multimodal mobility and minimizes VMT. These goals are also reflected in the 2012-2035 RTP/SCS, the City of Los Angeles Air Quality Element, and MP 2035. The Proposed Project is anticipated to reduce daily project area VMT by 3.4 percent as compared to future conditions without the Proposed Project. Per Capita VMT would decrease by 4.4 percent compared to existing conditions and by 3.4 percent compared to Future without Project conditions. Under Alternative 3A, it is expected that total VMT and VMT per Capita would be similar to the Proposed Project, with similar air emissions. Overall, Alternative 3A would be aligned with the 2012-2035 RTP/SCS as well as relevant air quality policy objectives of the City's Air Quality Element, Plan for a Healthy Los Angeles, and MP 2035.

Violate Air Quality Standards. Alternative 3A would implement the same transportation improvements as the Proposed Project. As with the Proposed Project, construction emissions under this alternative would not exceed SCAQMD thresholds, and construction impacts would not conflict with or obstruct implementation of the AQMP. Therefore, as with the Proposed Project, Alternative 3A would not result in a significant impact related to air quality standards.

With background growth, Alternative 3A would result in higher total VMT compared to existing conditions. Although traffic volumes would be higher due to background growth, pollutants emissions from mobile sources are expected to be much lower due to technological advances in vehicle emission control, turnover in the vehicle fleet, and new emission standards. As a result, similar to the Proposed Project, emissions under this alternative would not exceed the SCAQMD significance thresholds.

Cumulatively Considerable Increase in Criteria Pollutants. Alternative 3A would implement the same transportation improvements as the Proposed Project. Under both Alternative 3A and the Proposed Project, regional construction emissions of the nonattainment pollutants (PM10, PM2.5, and O_3 precursors [NOx and VOC]) would be less than the SCAQMD significance thresholds. Therefore, regional construction emissions related to Alternative 3A would not be cumulatively considerable, and impacts would be less than significant. However, localized construction emissions of particulate matter associated with the construction of the proposed transportation improvements under this alternative would exceed SCAQMD thresholds. Therefore, localized construction emissions related to Alternative 3A would be cumulatively considerable. This would be a significant impact.

With the technology advances noted above, as with the Proposed Project, operation of the proposed transportation improvements under Alternative 3A would result in a decrease in emissions of the nonattainment pollutants PM10, PM2.5, and O_3 precursors (NOx and VOC) compared to existing conditions. Therefore, as with the Proposed Project, operational emissions associated with Alternative 3A would not be cumulatively considerable and this impact would be less than significant.

Expose Sensitive Receptors to Substantial Pollutant Concentrations. Alternative 3A would implement the same transportation improvements as the Proposed Project. Under both Alternative 3A and the Proposed Project, construction of the Lincoln Boulevard Bridge Enhancement, the Lincoln Boulevard and Sepulveda Boulevard BRTs, and the I-10 Ramp Reconfiguration at Bundy Drive would exceed SCAQMD's LSTs for particulate matter and the threshold for TACs. This would be a significant and unavoidable impact.

Relative to operations, as with the Proposed Project, under Alternative 3A, with the vehicle emission control technologies noted above, emissions of mobile source air toxics would be lower than existing conditions and impacts would be less than significant.

Objectionable Odors Affecting a Substantial Number of People. Similar to the Proposed Project, Alternative 3A would not create objectionable odors affecting a substantial number of people, and the impact would be less than significant.

6.7.4.2 Biological Resources

Adverse Effects on Sensitive Species, Sensitive Habitats, or Wetlands. Although Alternative 3A would alter the method for implementing transportation improvements in the study area (i.e., by removal of vehicle travel lanes to provide additional right-of-way for transit or bicycle facilities), the list of transportation improvements that would be implemented would not change. As a result, the construction and operations related impacts to biological resources under Alternative 3A would be

the same as for the Proposed Project. Construction of the Lincoln Boulevard Bridge Enhancement would result in significant but mitigable impacts to special-status species and habitat in the BWER. As with the Proposed Project, other proposed transportation improvements could result in the removal, trimming, or disturbance of street trees and ornamental landscaping that have the potential to support nesting migratory birds that are protected by the MBTA and the CFGC. Construction activities occurring within the nesting season would have the potential to result in the removal or destruction of an active nest or direct mortality or injury of individual birds. As with the Proposed Project, this is a potentially significant impact; with mitigation, this impact would be less than significant.

Adverse Effects on Migratory Species or Wildlife Corridors. Habitat within the project area is generally fragmented and of low value (e.g., ornamental landscaping) and does not provide viable linkages or migration corridors between habitat areas. However, as noted above, street trees within or immediately adjacent to right-of-ways could potentially support migratory birds. As with the Proposed Project, construction activities associated with Alternative 3A could result in the removal or destruction of an active nest or direct mortality or injury of individual birds. This would be a potentially significant impact; with mitigation, this impact would be less than significant.

6.7.4.3 Greenhouse Gas Emissions

Generation of GHG Emissions. Alternative 3A would implement the same transportation improvements as the Proposed Project, therefore GHG impacts associated with construction activities would be the same. As with the Proposed Project, construction of the proposed transportation improvements under Alternative 3A would result in temporary increases in GHG emissions. The 2012-2035 RTP/SCS estimated that construction emissions from all development activity in Los Angeles County would be approximately 0.2 percent of countywide GHG emissions in 2035 (SCAG, 2012). As with the Proposed Project, construction-related emissions associated with Alternative 3A would be a small portion of total construction emissions estimated in the 2012-2035 RTP/SCS, which themselves are expected to represent only 0.2 percent of countywide GHG emissions in 2035.

As with the Proposed Project, with background growth, Alternative 3A would result in higher total VMT compared to existing conditions. Although traffic volumes would be higher due to background growth, pollutants emissions from mobile sources are expected to be much lower due to technological advances in vehicle emission control, turnover in the vehicle fleet, and new emission standards. As a result, similar to the Proposed Project, under Alternative 3A, impacts related to GHG emissions associated with operations, combined with amortized construction-related GHG emissions, would be less than significant.

Impede Attainment of SCAG's per Capita Emission Reduction Targets. The Proposed Project is anticipated to reduce daily project area VMT by 3.4 percent as compared to future conditions without the Proposed Project and by 4.4 percent compared to existing conditions, with related decreases in GHG emissions. Under Alternative 3A, it is expected that total VMT and VMT per Capita would be similar to the Proposed Project, with similar GHG emissions. Moreover, due to technological advances in vehicle emissions systems, projected turnover in the vehicle fleet, and future emission standards, GHG emissions associated with the Alternative 3A would be lower than existing conditions and slightly lower than Future without Project conditions. As all of the transportation improvements would still be implemented, Alternative 3A would advance the strategies provided in the 2012-2035 RTP/SCS to reach GHG emission reduction targets. Therefore, Alternative 3A would not impede attainment of SCAG's per Capita GHG emission reduction targets established in the 2012-2035 RTP/SCS and the impact would be less than significant.

Conflict with GHG Reduction Policies. Although Alternative 3A would alter the method for implementing transportation improvements in the study area (i.e., by removal of vehicle travel lanes to provide additional right-of-way for transit or bicycle facilities), the list of transportation improvements that would be implemented would not change. Therefore, as with the Proposed Project, the transportation improvements under Alternative 3A would increase mobility options, increase access to alternative modes of transportation, and reduce future transportation emissions. Per Capita GHG emissions under this alternative would be consistent with the 2012-2035 RTP/SCS regional CO_2 emission reduction targets and with SB 375. Alternative 3A would reduce VMT per Capita in the project area compared to existing and Future without Project conditions and would result in a reduction in daily VMT compared to the Future without Project scenario. Overall, Alternative 3A would be aligned with GHG reduction plans and policies contained in the 2012-2035 RTP/SCS, MP 2035, Plan for a Healthy Los Angeles, and Green LA Plan.

6.7.4.4 Land Use and Planning

Division of a Community. Although Alternative 3A would alter the method for implementing transportation improvements in the study area (i.e., by removal of on-street parking to provide additional right-of-way for transit or bicycle facilities), the list of transportation improvements that would be implemented would not change. Therefore, similar to the Proposed Project, construction of transportation facilities associated with Alternative 3A would be expected to result in temporary, short-term access disruptions to adjacent land uses. Due to their temporary and generally short-term nature, these impacts would be less than significant.

As with the Proposed Project, new transportation facilities associated with Alternative 3A would not be incompatible with surrounding land uses and would not create a barrier which could divide or isolate a community. On-street parking loss would be greater under Alternative 3A as compared to the Proposed Project since parking lane removal would be the primary method of achieving increased right-of-way when it is needed for transit and active transportation projects. Similar to the Proposed Project, parking loss could indirectly affect businesses; these affects would be greater under Alternative 3A. However, the change in parking availability would not cause a disruption of land uses that would constitute a significant land use impact. Therefore, as with the Proposed Project, Alternative 3A would not result in land use incompatibilities, or physically disrupt, divide, or isolate an existing neighborhood or community, and impacts would be less than significant.

Land Use Plan Consistency. As with the Proposed Project, construction and operation of the mobility improvements under Alternative 3A would be consistent with regional and local adopted plans and policies and impacts would be less than significant.

6.7.4.5 Noise and Vibration

Expose Persons or Generate Excessive Noise Levels above Standards or Generate a Substantial Temporary or Permanent Increase in Ambient Noise Levels. Although Alternative 3A would alter the method for implementing transportation improvements in the study area (i.e., by removal of on-street parking to provide additional right-of-way for transit or bicycle facilities), the list of transportation improvements that would be implemented would not change. As with the Proposed Project, under Alternative 3A, construction of transportation improvements would occur in proximity to sensitive receptors. These construction activities could generate noise levels up to 97 dBA at 50 feet. In many cases, construction of these improvements may occur over a period of just a few days in any one location; nevertheless, even with adherence to the LAMC, construction activities associated with Alternative 3A could exceed ambient noise levels by 5 dBA or more at a noise sensitive use for more

than ten days in a three-month period and could exceed existing ambient noise levels by 10 dBA or more at a noise sensitive use for more than one day. In general, these impacts would be infrequent and of short duration and would only affect a small number of sensitive receptors. Nevertheless, as with the Proposed Project, this would be a significant and unavoidable impact.

During operations, as with the Proposed Project, enhanced mobility under Alternative 3A may change vehicle speeds on some roadways, which could result in changes in noise levels. Decreased vehicle speeds could result in lower vehicle noise levels on some roadways during some periods compared to existing conditions, while increases in bus and private vehicle speeds on other roadways and/or during other time periods could result in higher vehicle noise levels compared to existing conditions. In addition, vehicle trips would increase in the study area due to background growth. Moreover, by preserving vehicle capacity, it is expected that total vehicle trips would be marginally greater under Alternative 3A than under the Proposed Project. However, increased vehicle trips and speeds would not reach a level that would exceed noise standards; as a result, noise impacts from vehicular traffic would be less than significant.

Alternative 3A would result in the implementation of the same curb-running rapid buses and BRT as the Proposed Project. As with the Proposed Project, curb-running rapid buses and BRT could increase noise levels at some sensitive land uses by more than 3 dBA. This would be a significant and unavoidable impact.

Generate Excessive Groundborne Vibration. Construction-related vibration impacts under Alternative 3A would be the same as the Proposed Project. As with the Proposed Project, under Alternative 3A, construction activities would occur in proximity to nearby structures and sensitive receptors. Based on the typical construction equipment likely to be used during construction, it is not anticipated that construction activities would generate vibration that would adversely affect structures. However, construction activities could exceed the human annoyance vibration threshold for frequent events. Human annoyance impacts from vibration associated with the majority of construction activities would be infrequent and of short duration and would only affect a small number of sensitive receptors. Moreover, implementation of recommended mitigation measures would reduce human annoyance impacts associated with vibration to the extent feasible. Nevertheless, even with mitigation, vibration at some locations would be a significant and unavoidable impact. As with the Proposed Project, operational vibration impacts under Alternative 3A from vehicular traffic would be less than significant.

Expose People Within Proximity to Airports to Excessive Noise Levels. As with the Proposed Project, construction of transportation improvements associated with Alternative 3A would not expose construction workers to excessive airport-related noise levels. Therefore, impacts would be less than significant.

Land uses in the project area would not change under Alternative 3A. Therefore, the project would not expose residents to excessive airport-related noise and no operational impact would occur.

6.7.4.6 Transportation

Conflict with Transportation Policies, Plans, or Programs. Overall, Alternative 3A would be consistent with applicable regional and local adopted plans and policies. Alternative 3A would provide the same multimodal options as would the Proposed Project. As with the Proposed Project, impacts relating to consistency with adopted policies, plans, and programs under Alternative 3A would be less than significant.

Exceed Thresholds for Roadway Operations on the Vehicular Circulation System. Alternative 3A would implement the proposed transportation improvements and utilize additional right-of-way made available by the removal of on-street parking to the extent that on-street parking is currently available. Most roadways within the Specific Plan area currently have on-street parking. However, on-street parking restrictions in which the parking lane becomes a vehicular travel lane to provide additional vehicle capacity are common during the morning and afternoon peak commute hours. Typically, the parking restriction on a roadway segment occurs only during the morning or afternoon peak hours depending on the directionality of vehicle flows (e.g., westbound vehicle demand is higher in the morning and eastbound vehicle demand is higher in the afternoon). Therefore, the implementation of Alternative 3A would result in additional vehicle capacity but not on all roadway segments and not during all times of the day. Overall congestion in the Specific Plan areas would still be expected to increase under Alternative 3A in comparison to existing conditions due to background growth. On a regional level, traffic in the study area is anticipated to increase in conjunction with regional population, housing, and employment growth projected to occur in the future. This growth will occur with or without implementation of Alternative 3A. The background growth influences the transportation analysis by accounting for the increased activity levels under Future with Alternative 3A conditions. Consequently, when comparing traffic operations under Future with Alternative 3A conditions to existing conditions, peak period congestion would be expected to continue to increase. As with the Proposed Project, impacts relating to roadway operations on the vehicular circulation system under Alternative 3A would be significant and unavoidable. Compared to the Proposed Project, Alternative 3A would maintain the existing roadway capacity along select corridors through the removal of on-street parking, which has the potential to result in slightly lesser impacts to vehicle operations as compared to the Proposed Project while providing the same multimodal benefits.

Consideration of New Potential Metrics. Alternative 3A would implement the proposed transportation improvements and utilize additional right-of-way made available by the removal of on-street parking to the extent that on-street parking is currently available. The benefits of distributing travelers across all modes of transportation (mode split) would be similar to the Proposed Project, and transit ridership would also be expected to increase to the levels envisioned with the Proposed Project. The implementation of the projects on the updated project lists would continue to result in a decrease in VMT and VMT per Capita in comparison to Future without Project conditions. The mode split improvements and the associated reductions in VMT would help to meet the State's goals of reducing greenhouse gas emissions, as mandated by AB 32 and SB 375. In addition, these performance indicators are potential metrics for evaluating transportation impacts that may be included in future revisions to City's L.A. CEQA Thresholds Guide. While the City of Los Angeles has not yet developed thresholds for these metrics, Alternative 3A would result in an increase in mode shares for transit, biking and walking and a decrease in VMT in comparison to Future without Project conditions. Given this conclusion, Alternative 3A would not result in a significant adverse transportation impact under these potential new CEQA metrics.

Exceed Thresholds for Neighborhood Traffic Intrusion. Alternative 3A would implement the proposed transportation improvements and utilize additional right-of-way made available by the removal of on-street parking to the extent that on-street parking is currently available. Overall congestion in the Specific Plan areas would still be expected to increase under Alternative 3A compared to existing conditions and would be slightly better as compared to the Proposed Project. Along roadways where Alternative 3A would cause significant traffic congestion, diversion of trips could occur onto adjacent parallel routes. It is anticipated that diversion would not occur on streets that operate at LOS D or better during peak periods because the average delay is not substantial. However, for the street

segments where the LOS would degrade from D to E or F, some trips could divert to adjacent streets to avoid longer travel times through congested locations. On a regional level, traffic in the study area is anticipated to increase in conjunction with regional population, housing, and employment growth projected to occur in the future. This growth will occur with or without implementation of Alternative 3A. The background growth influences the transportation analysis by accounting for the increased activity levels under Future with Alternative 3A conditions. Consequently, when comparing neighborhood traffic intrusion under Future with Alternative 3A conditions to existing conditions, traffic intrusion would be expected to continue to increase. As with the Proposed Project, impacts relating to neighborhood traffic intrusion under Alternative 3A would be significant and unavoidable. Compared to the Proposed Project, Alternative 3A would maintain the existing roadway capacity along select corridors through the removal of on-street parking, which could result in fewer vehicles diverting to neighborhood streets.

Exceed Thresholds for CMP and State Freeway Facilities. Alternative 3A would implement the proposed transportation improvements and utilize additional right-of-way made available by the removal of on-street parking to the extent that on-street parking is currently available. While traffic operations on select roadways be marginally better under Alternative 3A, overall congestion in the Specific Plan areas would still be expected to increase compared to existing conditions and would not be substantially different from the Proposed Project. On a regional level, traffic in the study area is anticipated to increase in conjunction with regional population, housing, and employment growth projected to occur in the future. This growth will occur with or without implementation of Alternative 3A. The background growth influences the transportation analysis by accounting for the increased activity levels under Future with Alternative 3A conditions. Consequently, when comparing traffic operations on CMP and state freeway facilities under Future with Alternative 3A conditions to existing conditions, congestion would be expected to continue to increase. As with the Proposed Project, impacts relating to CMP and state freeway facilities under Alternative 3A would be significant and unavoidable. Compared to the Proposed Project, Alternative 3A would result in similar impacts to CMP and state freeway facilities.

Adversely Affect Fire Protection Services/Emergency Access. Based on the City's adopted threshold of significance, Alternative 3A would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. LAFD is responsible for public safety and must respond to changing circumstances and therefore would act to maintain response times. The steps that LAFD would have to take to maintain public safety are not reasonably foreseeable at this time. Options available to LAFD include expanding the Fire Preemption System, increasing staffing levels, and adding new fire stations(s) to underserved areas. The potential for new fire station construction is speculative at the present time and is therefore not analyzed as part of Alternative 3A. Depending on the location of new fire protection facilities, operational impacts (primarily noise) could occur; however, such impacts are unforeseeable at this time. As with the Proposed Project, impacts relating to emergency access under Alternative 3A would be less than significant.

Disrupt Public Transit, Bicycle, or Pedestrian Facilities. Overall, Alternative 3A would not disrupt existing public transit, bicycle, or pedestrian facilities or interfere with planned facilities. As with the Proposed Project, impacts relating to the disruption to existing public transit, bicycle, or pedestrian facilities or interference with planned facilities under Alternative 3A would be less than significant.

Substantially Change Transportation Safety. None of the transportation system improvements under Alternative 3A would introduce new safety hazards at intersections or along roadway segments, as most would be designed to improve safety for all roadway users. As with the Proposed Project, impacts relating to transportation safety would be less than significant.

Construction Activities on Major Corridors. Implementation of transportation improvements under Alternative 3A would mostly consist of roadway restriping and limited changes to the physical configuration of curbs, and thus, would likely be short in duration (lasting up to a few weeks), while other projects, such as the Lincoln Boulevard Bridge Enhancement, I-10 Ramp Reconfiguration at Bundy Drive, and center-running BRT on Lincoln and Sepulveda boulevards, would require longer construction duration. As with the Proposed Project, temporary construction impacts under Alternative 3A would be significant and unavoidable.

Parking. Parking deficits are considered to be social effects, rather than impacts on the physical environment as defined by CEQA. While a project's social impacts need not be treated as significant impacts on the environment, the secondary physical impacts that would be triggered by a social impact must be addressed. Some of the transportation projects contained in Alternative 3A would remove on-street parking in certain locations while others provide parking solutions. For the purpose of analyzing potential impacts at a programmatic level, assumptions needed to be made as to how the projects could be implemented based on conceptual designs. Under Alternative 3A, it was assumed that some of the proposed transportation improvements would utilize additional right-of-way made available by the removal of on-street parking to the extent that on-street parking is currently available. Most roadways within the Specific Plan area currently have on-street parking. However, on-street parking restrictions in which the parking lane becomes a vehicular travel lane to provide additional vehicle capacity are common during the morning and afternoon peak commute hours. Typically, the parking restriction on a roadway segment occurs only during the morning or afternoon peak hours depending on the directionality of vehicle flows (e.g., westbound vehicle demand is higher in the morning and eastbound vehicle demand is higher in the afternoon). Alternative 3A would result in a loss of on-street parking spaces that could increase VMT if people drive farther to find parking or seek an alternate destination with more convenient parking. However, this increased VMT (attributed to finding parking) would be expected to be offset by implementing the parking projects and programs included in the Proposed Project. Hence, any secondary environmental impacts which may result from a shortfall in parking are anticipated to be minor and other transportation analyses reasonably address potential secondary impacts. As with the Proposed Project, traffic impacts related to parking under Alternative 3A would be less than significant.

6.7.5 Alternative 3B – Reduced Vehicle Capacity

All transportation improvements associated with the Proposed Project are included in this alternative. This alternative offers a distinction on how right-of-way is utilized for the proposed transportation improvements. Under this alternative, as with the Proposed Project, the majority of the proposed transportation improvements would be achieved within existing roadway right-of-ways. Under the Proposed Project, it is assumed that when additional right-of-way for projects (such as BRT and bicycle facilities) is needed, it would be provided through a combination of vehicular capacity reductions (lane conversions) along with on-street parking removal. Under this alternative, the Reduced Vehicle Capacity alternative, when additional right-of-way is required, right-of-way would be provided solely by converting vehicle travel lanes into transit/bicycle facilities, with no removal of on-street parking.

The physical distinctions between Alternative 3B and the Proposed Project are minimal, as right-of-way reallocation for transportation improvements would only be necessary on select roadway segments. Under this alternative, as compared to the Proposed Project, there would be marginally less vehicle capacity and slightly more on-street parking spaces on select roadway segments. Overall, VMT in the study area would be similar to the Proposed Project. The following analysis discusses the potential impacts associated with the reduced vehicle capacity under Alternative 3B compared to those of the Proposed Project.

6.7.5.1 Air Quality

Conflict with Air Quality Plans. Although Alternative 3B would alter the method for implementing transportation improvements in the study area (i.e., by removal of parking to provide additional right-of-way for transit or bicycle facilities), the list of transportation improvements that would be implemented would not change. Therefore, as with the Proposed Project, Alternative 3B would not result in any alterations in land use in the project area and would not affect future regional development anticipated in the 2012-2035 RTP/SCS or incorporated as assumptions in the AQMP. Alternative 3B would improve mobility in the Westside by providing more transportation options and conditions that would promote use of alternative forms of transportation, including public transit, bicycles, and walking.

The purpose of the 2012 AQMP is to provide updated air pollution control strategies to bring the SoCAB into compliance with federal ambient air quality standards. The AQMP relies upon a number of strategies to meet the federal ambient air quality standards, including promotion of a sustainable transportation system that emphasizes transit and non-motorized transportation and that increases multimodal mobility and minimizes VMT. These goals are also reflected in the 2012-2035 RTP/SCS, the City of Los Angeles Air Quality Element, and MP 2035. The Proposed Project is anticipated to reduce daily project area VMT by 3.4 percent as compared to future conditions without the Proposed Project. Per capita VMT would decrease by 4.4 percent compared to existing conditions and by 3.4 percent compared to Future without Project conditions. Under Alternative 3B, it is expected that total VMT and VMT per Capita would be similar to the Proposed Project, with similar air emissions. Alternative 3B would be aligned with the 2012-2035 RTP/SCS as well as relevant air quality policy objectives of the City's Air Quality Element, Plan for a Healthy Los Angeles, and MP 2035.

Violate Air Quality Standards. Alternative 3B would implement the same transportation improvements as the Proposed Project. As with the Proposed Project, construction emissions under this alternative would not exceed SCAQMD thresholds, and construction impacts would not conflict with or obstruct implementation of the AQMP. Therefore, as with the Proposed Project, Alternative 3B would not result in a significant impact related to air quality standards.

With background growth, Alternative 3B would result in higher total VMT compared to existing conditions. Although traffic volumes would be higher due to background growth, pollutants emissions from mobile sources are expected to be much lower due to technological advances in vehicle emission control, turnover in the vehicle fleet, and new emission standards. As a result, similar to the Proposed Project, emissions under this alternative would not exceed the SCAQMD significance thresholds.

Cumulatively Considerable Increase in Criteria Pollutants. Alternative 3B would implement the same transportation improvements as the Proposed Project. Under both Alternative 3B and the Proposed Project, regional construction emissions of the nonattainment pollutants (PM10, PM2.5, and O_3 precursors [NOx and VOC]) would be less than the SCAQMD significance thresholds. Therefore,

regional construction emissions related to Alternative 3B would not be cumulatively considerable, and impacts would be less than significant. However, localized construction emissions of particulate matter associated with the construction of the proposed transportation improvements under this alternative would exceed SCAQMD thresholds. Therefore, localized construction emissions related to Alternative 3B would be cumulatively considerable. This would be a significant impact.

With the technology advances noted above, as with the Proposed Project, operation of the proposed transportation improvements under Alternative 3B would result in a decrease in emissions of the nonattainment pollutants PM10, PM2.5, and O_3 precursors (NOx and VOC) compared to existing conditions. Therefore, as with the Proposed Project, operational emissions associated with Alternative 3B would not be cumulatively considerable and this impact would be less than significant.

Expose Sensitive Receptors to Substantial Pollutant Concentrations. Alternative 3B would implement the same transportation improvements as the Proposed Project. Under both Alternative 3B and the Proposed Project, construction of the Lincoln Boulevard Bridge Enhancement, the Lincoln Boulevard and Sepulveda Boulevard BRTs, and the I-10 Ramp Reconfiguration at Bundy Drive would exceed SCAQMD's LSTs for particulate matter and the threshold for TACs. This would be a significant and unavoidable impact.

Relative to operations, as with the Proposed Project, under Alternative 3B, with the vehicle emission control technologies noted above, emissions of mobile source air toxics would be lower than existing conditions and impacts would be less than significant.

Objectionable Odors Affecting a Substantial Number of People. Similar to the Proposed Project, Alternative 3B would not create objectionable odors affecting a substantial number of people, and the impact would be less than significant.

6.7.5.2 Biological Resources

Adverse Effects on Sensitive Species, Sensitive Habitats, or Wetlands. Although Alternative 3B would alter the method for implementing transportation improvements in the study area (i.e., by removal of parking to provide additional right-of-way for transit or bicycle facilities), the list of transportation improvements that would be implemented would not change. Therefore, the construction and operations related impacts to biological resources under Alternative 3B would be the same as for the Proposed Project. Construction of the Lincoln Boulevard Bridge Enhancement would result in significant but mitigable impacts to special-status species and habitat in the BWER. As with the Proposed Project, other proposed transportation improvements could result in the removal, trimming, or disturbance of street trees and ornamental landscaping that have the potential to support nesting migratory birds that are protected by the MBTA and the CFGC. Construction activities occurring within the nesting season would have the potential to result in the removal or destruction of an active nest or direct mortality or injury of individual birds. As with the Proposed Project, this is a potentially significant impact; with mitigation, this impact would be less than significant.

Adverse Effects on Migratory Species or Wildlife Corridors. Habitat within the project area is generally fragmented and of low value (e.g., ornamental landscaping) and does not provide viable linkages or migration corridors between habitat areas. However, as noted above, street trees within or immediately adjacent to right-of-ways could potentially support migratory birds. As with the Proposed Project, construction activities associated with Alternative 3B could result in the removal or destruction of an active nest or direct mortality or injury of individual birds. This would be a potentially significant impact; with mitigation, this impact would be less than significant.

6.7.5.3 Greenhouse Gas Emissions

Generation of GHG Emissions. Alternative 3B would implement the same transportation improvements as the Proposed Project, therefore GHG impacts associated with construction activities would be the same. As with the Proposed Project, construction of the proposed transportation improvements under Alternative 3B would result in temporary increases in GHG emissions. The 2012-2035 RTP/SCS estimated that construction emissions from all development activity in Los Angeles County would be approximately 0.2 percent of countywide GHG emissions in 2035 (SCAG, 2012). As with the Proposed Project, construction-related emissions associated with Alternative 3B would be a small portion of total construction emissions estimated in the 2012-2035 RTP/SCS, which themselves are expected to represent only 0.2 percent of countywide GHG emissions in 2035.

As with the Proposed Project, with background growth, Alternative 3B would result in higher total VMT compared to existing conditions. Although traffic volumes would be higher due to background growth, pollutants emissions from mobile sources are expected to be much lower due to technological advances in vehicle emission control, turnover in the vehicle fleet, and new emission standards. As a result, similar to the Proposed Project, impacts related to GHG emissions associated with operations, combined with amortized construction-related GHG emissions, under Alternative 3B would be less than significant.

Impede Attainment of SCAG's per Capita Emission Reduction Targets. The Proposed Project is anticipated to reduce daily project area VMT by 3.4 percent as compared to future conditions without the Proposed Project and by 4.4 percent compared to existing conditions, with related decreases in GHG emissions. Under Alternative 3B, it is expected that total VMT and VMT per Capita would be similar to the Proposed Project, with similar GHG emissions. Moreover, due to technological advances in vehicle emissions systems, projected turnover in the vehicle fleet, and future emission standards, GHG emissions associated with the Alternative 3B would be lower than existing conditions and slightly lower than Future without Project conditions. As all of the transportation improvements would still be implemented, Alternative 3B would advance the strategies provided in the 2012-2035 RTP/SCS to reach GHG emission reduction targets. Therefore, Alternative 3B would not impede attainment of SCAG's per Capita GHG emission reduction targets established in the 2012-2035 RTP/SCS and the impact would be less than significant.

Conflict with GHG Reduction Policies. Although Alternative 3B would alter the method for implementing transportation improvements in the study area (i.e., by removal of parking to provide additional right-of-way for transit or bicycle facilities), the list of transportation improvements that would be implemented would not change. Therefore, as with the Proposed Project, the transportation improvements under Alternative 3B would increase mobility options, increase access to alternative modes of transportation, and reduce future transportation emissions. Per Capita GHG emissions under this alternative would be consistent with the 2012-2035 RTP/SCS regional CO_2 emission reduction targets and with SB 375. Alternative 3B would reduce VMT per Capita in the project area compared to existing and Future without Project conditions and would result in a reduction in daily VMT compared to the Future without Project scenario. Therefore, Alternative 3B would be aligned with GHG reduction plans and policies contained in the 2012-2035 RTP/SCS, MP 2035, Plan for a Healthy Los Angeles, and Green LA Plan.

6.7.5.4 Land Use and Planning

Division of a Community. Although Alternative 3B would alter the method for implementing transportation improvements in the study area (i.e., by removal of vehicle travel lanes to provide additional right-of-way for transit or bicycle facilities), the list of transportation improvements that would be implemented would not change. Therefore, similar to the Proposed Project, construction of transportation facilities associated with Alternative 3B would be expected to result in temporary, short-term access disruptions to adjacent land uses. Due to their temporary and generally short-term nature, these impacts would be less than significant.

As with the Proposed Project, new transportation facilities associated with Alternative 3B would not be incompatible with surrounding land uses and would not create a barrier which could divide or isolate a community. Unlike the Proposed Project, no loss of on-street parking would occur; as a result, indirect impacts to businesses related to a loss of parking would not occur under Alternative 3B. As with the Proposed Project, Alternative 3B would not result in land use incompatibilities, or physically disrupt, divide, or isolate an existing neighborhood or community, and impacts would be less than significant.

Land Use Plan Consistency. As with the Proposed Project, construction and operation of the mobility improvements under Alternative 3B would be consistent with regional and local adopted plans and policies and impacts would be less than significant.

6.7.5.5 Noise and Vibration

Expose Persons or Generate Excessive Noise Levels above Standards or Generate a Substantial Temporary or Permanent Increase in Ambient Noise Levels. Although Alternative 3B would alter the method for implementing transportation improvements in the study area (i.e., by removal of vehicle travel lanes to provide additional right-of-way for transit or bicycle facilities), the list of transportation improvements that would be implemented would not change. As with the Proposed Project, under Alternative 3B, construction of transportation improvements would occur in proximity to sensitive receptors. These construction activities could generate noise levels up to 97 dBA at 50 feet. In many cases, construction of these improvements may occur over a period of just a few days in any one location; nevertheless, even with adherence to the LAMC, construction activities associated with Alternative 3B could exceed ambient noise levels by 5 dBA or more at a noise sensitive use for more than ten days in a three-month period and could exceed existing ambient noise levels by 10 dBA or more at a noise sensitive use for more than one day. In general, these impacts would be infrequent and of short duration and would only affect a small number of sensitive receptors. Nevertheless, as with the Proposed Project, this would be a significant and unavoidable impact.

During operations, as with the Proposed Project, enhanced mobility under Alternative 3B may change vehicle speeds on some roadways, which could result in changes in noise levels. Decreased vehicle speeds could result in lower vehicle noise levels on some roadways during some periods compared to existing conditions, while increases in bus and private vehicle speeds on other roadways and/or during other time periods could result in higher vehicle noise levels compared to existing conditions. In addition, vehicle trips would increase in the study area due to background growth, however, by eliminating vehicle capacity to a greater degree than the Proposed Project, it is expected that total VMT would be reduced to a greater extent than under the Proposed Project. Increased vehicle trips and speeds would not reach a level that would exceed noise standards; as a result, noise impacts from vehicular traffic would be less than significant.

Alternative 3B would result in the implementation of the same curb-running rapid buses and BRT as the Proposed Project. As with the Proposed Project, curb-running rapid buses and BRT could increase noise levels at some sensitive land uses by more than 3 dBA. This would be a significant and unavoidable impact.

Generate Excessive Groundborne Vibration. Construction-related vibration impacts under Alternative 3B would be the same as the Proposed Project. As with the Proposed Project, under Alternative 3B, construction activities would occur in proximity to nearby structures and sensitive receptors. Based on the typical construction equipment likely to be used during construction, it is not anticipated that construction activities would generate vibration that would adversely affect structures. However, construction activities could exceed the human annoyance vibration threshold for frequent events. Human annoyance impacts from vibration associated with the majority of construction activities would be infrequent and of short duration and would only affect a small number of sensitive receptors. Moreover, implementation of recommended mitigation measures would reduce human annoyance impacts associated with vibration to the extent feasible. Nevertheless, even with mitigation, vibration at some locations would be a significant and unavoidable impact. As with the Proposed Project, under Alternative 3B, operational vibration impacts from vehicular traffic would be less than significant.

Expose People Within Proximity to Airports to Excessive Noise Levels. As with the Proposed Project, construction of transportation improvements associated with Alternative 3B would not expose construction workers to excessive airport-related noise levels. Therefore, impacts would be less than significant.

Land uses in the project area would not change under Alternative 3B. Therefore, the project would not expose residents to excessive airport-related noise and no operational impact would occur.

6.7.5.6 Transportation

Conflict with Transportation Policies, Plans, or Programs. Overall, Alternative 3B would be consistent with applicable regional and local adopted plans and policies. Alternative 3B would provide the same multimodal options as would the Proposed Project. As with the Proposed Project, impacts relating to consistency with adopted policies, plans and programs under Alternative 3B would be less than significant.

Exceed Thresholds for Roadway Operations on the Vehicular Circulation System. Alternative 3B would implement the proposed transportation improvements and utilize additional right-of-way made available by the conversion of vehicular travel lanes to other multimodal facilities, such as bus-only lanes or bicycle facilities. Therefore, the implementation of Alternative 3B would result in a reduction in vehicle capacity. Overall congestion in the Specific Plan areas would continue to increase under Alternative 3B in comparison to existing conditions due to background growth. On a regional level, traffic in the study area is anticipated to increase in conjunction with regional population, housing, and employment growth projected to occur in the future. This growth will occur with or without implementation of Alternative 3B. The background growth influences the transportation analysis by accounting for the increased activity levels under Future with Alternative 3B conditions. Consequently, when comparing traffic operations under Future with Alternative 3B conditions to existing conditions, peak period congestion would be expected to continue to increase. As with the Proposed Project, impacts relating to roadway operations on the vehicular circulation system under Alternative 3B would be significant and unavoidable. Compared to the Proposed Project, Alternative

3B would provide less roadway capacity along select corridors through the conversion of vehicular travel lanes, which has the potential to result in slightly greater impacts to vehicle operations as compared to the Proposed Project.

Consideration of New Potential Metrics. Alternative 3B would implement the proposed transportation improvements and utilize additional right-of-way made available by the conversion of vehicular travel lanes to other multimodal facilities. The benefits of distributing travelers across all modes of transportation (mode split) would be similar to the Proposed Project, and transit ridership would also be expected to increase to the levels envisioned with the Proposed Project. The implementation of the projects on the updated project lists would continue to result in a decrease in VMT and VMT per Capita in comparison to Future without Project conditions. The mode split improvements and the associated reductions in VMT would help to meet the State's goals of reducing greenhouse gas emissions, as mandated by AB 32 and SB 375. In addition, these performance indicators are potential metrics for evaluating transportation impacts that may be included in future revisions to City's L.A. CEQA Thresholds Guide. While the City of Los Angeles has not yet developed thresholds for these metrics, Alternative 3B would result in an increase in mode shares for transit, biking and walking and a decrease in VMT in comparison to Future without Project conditions. Given this conclusion, Alternative 3B would not result in a significant adverse transportation impact under these potential new CEQA metrics.

Exceed Thresholds for Neighborhood Traffic Intrusion. Alternative 3B would implement the proposed transportation improvements and utilize additional right-of-way made available by the conversion of vehicular travel lanes to other multimodal facilities, such as bus-only lanes or bicycle facilities. Therefore, the implementation of Alternative 3B would result in a reduction in vehicle capacity. Overall congestion in the Specific Plan areas would continue to increase under Alternative 3B compared to existing conditions and would not be substantially different from the Proposed Project. Along roadways where Alternative 3B would cause significant traffic congestion, diversion of trips could occur onto adjacent parallel routes. It is anticipated that diversion would not occur on streets that operate at LOS D or better during peak periods because the average delay is not substantial. However, for the street segments where the LOS would degrade from D to E or F, some trips could divert to adjacent streets to avoid longer travel times through congested locations. On a regional level, traffic in the study area is anticipated to increase in conjunction with regional population, housing, and employment growth projected to occur in the future. This growth will occur with or without implementation of Alternative 3B. The background growth influences the transportation analysis by accounting for the increased activity levels under Future with Alternative 3B conditions. Consequently, when comparing neighborhood traffic intrusion under Future with Alternative 3B conditions to existing conditions, traffic intrusion would be expected to continue to increase. As with the Proposed Project, impacts relating to neighborhood traffic intrusion under Alternative 3B would be significant and unavoidable. Compared to the Proposed Project, Alternative 3B would provide reduced roadway capacity along select corridors through the conversion of vehicular travel lanes to other multimodal facilities, which could result in more vehicles diverting to neighborhood streets and the impact to neighborhood traffic intrusion would likely be greater than the Proposed Project.

Exceed Thresholds for CMP and State Freeway Facilities. Alternative 3B would implement the proposed transportation improvements and utilize additional right-of-way made available by the conversion of vehicular travel lanes to other multimodal facilities, such as bus-only lanes or bicycle facilities. Overall congestion in the Specific Plan areas would continue to increase compared to existing conditions and would not be substantially different from the Proposed Project. On a regional level, traffic in the study

area is anticipated to increase in conjunction with regional population, housing, and employment growth projected to occur in the future. This growth will occur with or without implementation of Alternative 3B. The background growth influences the transportation analysis by accounting for the increased activity levels under Future with Alternative 3B conditions. Consequently, when comparing traffic operations on CMP and state freeway facilities under Future with Alternative 3B conditions to existing conditions, congestion would be expected to continue to increase. As with the Proposed Project, impacts relating to CMP and state freeway facilities under Alternative 3B would be significant and unavoidable. Compared to the Proposed Project, Alternative 3B would result in similar impacts to CMP and state freeway facilities.

Adversely Affect Fire Protection Services/Emergency Access. Based on the City's adopted threshold of significance, Alternative 3B would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. LAFD is responsible for public safety and must respond to changing circumstances and therefore would act to maintain response times. The steps that LAFD would have to take to maintain public safety are not reasonably foreseeable at this time. Options available to LAFD include expanding the Fire Preemption System, increasing staffing levels, and adding new fire stations(s) to underserved areas. The potential for new fire station construction is speculative at the present time and is therefore not analyzed as part of Alternative 3B. Depending on the location of new fire protection facilities, operational impacts (primarily noise) could occur; however, such impacts are unforeseeable at this time. As with the Proposed Project, impacts relating to emergency access under Alternative 3B would be less than significant.

Disrupt Public Transit, Bicycle, or Pedestrian Facilities. Overall, Alternative 3B would not disrupt existing public transit, bicycle or pedestrian facilities or interfere with planned facilities. As with the Proposed Project, impacts relating to the disruption to existing public transit, bicycle, or pedestrian facilities or interference with planned facilities under Alternative 3B would be less than significant.

Substantially Change Transportation Safety. None of the transportation system improvements under Alternative 3B would introduce new safety hazards at intersections or along roadway segments, as most would be designed to improve safety for all roadway users. As with the Proposed Project, impacts relating to transportation safety would be less than significant.

Construction Activities on Major Corridors. Implementation of transportation improvements under Alternative 3B would mostly consist of roadway restriping and limited changes to the physical configuration of curbs, and thus, would likely be short in duration (lasting up to a few weeks), while other projects, such as the Lincoln Boulevard Bridge Enhancement, I-10 Ramp Reconfiguration at Bundy Drive, and center-running BRT on Lincoln and Sepulveda boulevards, would require longer construction duration. As with the Proposed Project, temporary construction impacts under Alternative 3B would be significant and unavoidable.

Parking. Parking deficits are considered to be social effects, rather than impacts on the physical environment as defined by CEQA. While a project's social impacts need not be treated as significant impacts on the environment, the secondary physical impacts that would be triggered by a social impact must be addressed. For the purpose of analyzing potential impacts at a programmatic level, assumptions needed to be made as to how the projects could be implemented based on conceptual designs. Under Alternative 3B, it was assumed that some of the proposed transportation improvements would utilize additional right-of-way made available by the conversion of vehicular travel lanes to other multimodal facilities and maintain existing on-street parking. As with the

Proposed Project, traffic impacts related to parking under Alternative 3B would be less than significant.

6.8 Environmentally Superior Alternative

The State CEQA Guidelines Section 15126.6(e)(2) 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.

Table 6-1 provides a tabular comparison of the environmental impacts of each alternative, as compared to the impacts of the Proposed Project. The comparative determination is subject to a degree of subjectivity, as some impact categories address more than one consideration. In addition, in some cases, differences between an alternative and the Proposed Project may not be substantial. In other cases, an alternative may reduce or avoid significant impacts associated with the Proposed Project in one area, but exacerbate significant impacts in another area. As shown in the table, there is no single alternative that would be environmentally superior with respect to every environmental issue. Therefore, the determination of the environmentally superior alternative was based on the impacts of each alternative as a whole.

Based on an evaluation of comparative impacts Alternative 3A, the Reduced Parking Alternative, is considered to be the environmentally superior alternative. Alternative 3A is the only alternative that would reduce the severity of one of the significant operational impacts associated with the Proposed Project without increasing the severity of other significant impacts. By implementing all of the proposed transportation improvements associated with the Proposed Project, but doing so in a way that would maintain existing roadway capacity on select corridors through the removal of on-street parking, Alternative 3A has the potential to result in slightly lesser impacts to vehicle operations (i.e., congestion) and a slightly lesser occurrence of neighborhood traffic diversion, while fulfilling all of the project objectives.

Compared to Alternative 3A, Alternatives 2A and 2B would have fewer construction-related impacts associated with air quality, noise, vibration, and construction traffic. However, construction impacts would be temporary and short-term. In the long-term, Alternatives 2A and 2B would not result in the same reduction in impacts associated with vehicle operations as would Alternative 3A, or the reduction in operational impacts associated with neighborhood traffic diversion. Moreover, Alternatives 2A and 2B would not implement one of the key transportation improvements associated with the Proposed Project (i.e., the Sepulveda Boulevard or Lincoln Boulevard BRTs, respectively). As a result, these alternatives would not achieve the same consistency with regional air quality, GHG, land use, or transportation plans as would Alternative 3A, and would only partially fulfill one of the key objectives of the Proposed Project (i.e., the provision of dedicated transit lines that serve north-south corridors and provide connections to planned east-west transit lines).

As compared to Alternative 3A, by decreasing vehicle capacity, Alternative 3B would increase the severity of significant and unavoidable impacts relating to transportation performance standards and neighborhood traffic intrusion.

Under the No Project Alternative, some of the significant impacts associated with the Proposed Project would be reduced or avoided. Specifically, the No Project Alternative would avoid significant but mitigable impacts to the BWER that would occur with construction of the Lincoln Boulevard Bridge Enhancement under the Proposed Project. In addition, under the No Project Alternative, significant and unavoidable operational noise impacts associated with curb-running rapid buses and BRT would not occur. However, the No Project Alternative would increase VMT and VMT per Capita, which would result in increased operational criteria pollutant and GHG emissions, and would not result in the same level of consistency with plans and policies concerning transportation in comparison to the Proposed Project. The No Project Alternative would also result in greater construction impacts, and would increase the severity of significant and unavoidable impacts associated with air quality, noise, vibration, and construction traffic. In addition, street widenings associated with the No Project Alternative would require the acquisition of private parcels and the demolition of buildings adjacent to existing roadways, which would be disruptive and could physically alter the makeup of existing neighborhoods and communities. While land use impacts would be less than significant under the No Project Alternative, disruption to existing neighborhoods would be greater than under the Proposed Project. Moreover, the No Project Alternative would not achieve the primary objectives of the Proposed Project with respect to the provision of multimodal transportation options, reducing VMT and VMT per Capita, reducing greenhouse gas emissions, and enhancing mobility on key transportation corridors.