

## 5.1 Introduction

California Environmental Quality Act (CEQA), Guidelines Section 15126.6 requires that an environmental impact report (EIR) describe a range of reasonable alternatives to the project or to the location of the project that could feasibly avoid or lessen any significant environmental impacts while substantially attaining the project’s basic objectives. As required by CEQA, this chapter describes the No Project Alternative and compares the potential environmental impacts with those impacts of the Madera High-Speed Rail Station Full-Build Project Phase 3 (Project).

Key provisions of CEQA Guidelines Section 15126.6 pertaining to the analysis of alternatives to a project are summarized below:

- The discussion of alternatives will focus on alternatives to the Project or its location that are capable of avoiding or substantially lessening any significant effects of the Project, even if those alternatives would impede, to some degree, the attainment of the Project objectives or be more costly.
- The No Project Alternative will be evaluated along with its impacts. The No Project analysis will discuss the existing conditions at the time the Notice of Preparation was published as well as what would be reasonably expected to occur in the foreseeable future if the Project were not approved based on current plans and consistent with available infrastructure and community services.
- The range of alternatives required in an EIR is governed by a “rule of reason;” therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. Alternatives will be limited to those alternatives that would avoid or substantially lessen any of the significant effects of the Project.
- An EIR need not consider an alternative with effects that cannot be reasonably ascertained, when implementation is remote and speculative, and if its selection would not achieve the basic Project objectives.
- The range of feasible alternatives is selected and discussed in a manner to foster meaningful public participation and informed decision-making. Among the factors that may be taken into account when addressing the feasibility of alternatives, as described in CEQA Guidelines Section 15126.6(f)(1), are environmental impacts, site suitability, economic viability, social and political acceptability, technological capacity, availability of infrastructure, general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the proponent could reasonably acquire, control, or otherwise have access to the alternative site.
- The EIR will include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those effects that would be caused by the Project as proposed, the significant effects

1 of the alternative will be discussed, but in less detail than the significant effects of the Project as  
2 proposed.

3 Due to the geographical constraints of where the second platform needs to be located, San Joaquin  
4 Joint Powers Authority (SJPPA) considered limited alternatives based primarily on engineering  
5 constraints.

## 6 **5.2 Analysis of Alternatives**

### 7 **5.2.1 No Project Alternative**

8 Section 15126.6(e) of the CEQA Guidelines requires the analysis of a No Project Alternative. Per  
9 Section 15126.6 (e)(2), the No Project Alternative analysis must discuss the existing conditions as  
10 well as what would reasonably be expected to occur in the foreseeable future if the Project were not  
11 approved. Section 15126.6(e)(3)(B) of the CEQA Guidelines states the following.

12 If the project is...a development project on an identifiable property, the “no project” alternative is the  
13 circumstance under which the project does not proceed. Here the discussion would compare the  
14 environmental effects of the property remaining in its existing state against environmental effects  
15 that would occur if the project were approved. If disapproval of the project under consideration  
16 would result in predictable actions by others, such as the proposal of some other project, this “no  
17 project” consequence should be discussed. In certain instances, the “no project” alternative means  
18 “no build,” wherein the existing environmental setting is maintained. However, where failure to  
19 proceed with the project will not result in preservation of existing environmental conditions, the  
20 analysis should identify the practical result of the project’s non-approval and not create and analyze  
21 a set of artificial assumptions that would be required to preserve the existing physical environment.

22 The No Project Alternative is neither required nor expected to meet the Project’s basic objectives or  
23 avoid or reduce any of the significant impacts associated with the Project.

24 Under the No Project Alternative, none of the Project components would be constructed. At this  
25 location, Phases 1 and 2 of the Madera HSR Station would still be operational under the No Project  
26 Alternative.

- 27 • **Phase 1: Relocated Station (for *San Joaquins* only).** Phase 1 would close the current  
28 San Joaquins station in Madera Acres and relocate it to a site just north of Avenue 12
- 29 • **Phase 2: Partial Build-Out of the Proposed Madera HSR Station.** Phase 2 would develop the  
30 eastern half of the proposed Madera HSR Station. Components of this phase include a station  
31 siding track, a single side-platform located immediately east of the HSR mainline tracks (which  
32 are being implemented as part of California HSR Project by CHSRA), a new station building, and  
33 expanded parking over the approved amount of parking for Phase 1.

34

## 1    **5.2.2        Build Alternatives to the Project**

### 2    **5.2.2.1      Identification of Project Alternatives**

3        The discussion of alternatives will focus on alternatives to the Project or its location that are capable  
4        of avoiding or substantially lessening any significant effects of the Project, even if those alternatives  
5        would impede, to some degree, the attainment of the Project objectives or be more costly. The range  
6        of alternatives required in an EIR is governed by a “rule of reason;” therefore, the EIR must evaluate  
7        only those alternatives necessary to permit a reasoned choice. Alternatives will be limited to those  
8        alternatives that would avoid or substantially lessen any of the significant effects of the Project.

9        For this analysis, two alternatives to the Project were considered:

- 10       -   **Alternate Location Alternative:** This alternative would place the Phase 3 alignment and  
11       elements elsewhere than where the Project is currently located. Moving the Station to a different  
12       location away from the HSR ROW would not meet the requirements of an HSR station as the new  
13       platform needs to be located in close proximity to the existing HSR ROW to be serviced by HSR.  
14       If the HSR station is moved to the west side instead of the east side, it would change Phase 2 and  
15       result in two access roads (one for SJRRC on the east side and one for HSR on the west side).  
16       This would result in a larger footprint and additional impacts. Although the HSR station would  
17       be in close proximity to the HSR ROW it would not reduce the environmental impacts of the  
18       proposed Project. Therefore, this alternative is not feasible and will not be considered further.
- 19       -   **Reduced Footprint Alternative:** This alternative would place the new platform between the  
20       HSR right-of-way and the proposed Phase 2 platform. This would create engineering and  
21       operational constraints (angles at which trains would deviate from the main HSR track and  
22       crossing over tracks; reduced speeds) would affect efficiency and speed of HSR trains in this  
23       area. This type of station would not meet HSR engineering requirements for operations after the  
24       EOS. In addition, the Reduced Footprint Alternative may potentially reduce the amount of  
25       agricultural land that would be converted no non-agricultural land, but would not eliminate the  
26       need of agricultural land. Consequently, significant and unavoidable impacts would remain, as  
27       the Reduced Footprint Alternative would potentially create engineering constraints, reduce  
28       speeds, and not meet HSR standards for station layouts, as well as not eliminate significant and  
29       unavoidable impacts to agricultural land conversion. Therefore, this alternative is not feasible  
30       and will not be considered further.

## 31    **5.2.3        No Project Environmental Impact Analysis**

### 32    **5.2.3.1      Agriculture**

33        Under the No Project Alternative, no additional Important Farmland would be converted to non-  
34       agricultural use as no new right-of-way would be required. The reasonably foreseeable development  
35       in the area would be the San Joaquins platform and improvements associated with Phase 1 of the  
36       Madera Station Project and the HSR platform and improvements associated with Phase 2 of the  
37       Madera Station Project, and this project already cleared the agricultural land it would require in a  
38       separate environmental document (SJRRC, 2021). Therefore, the No Project Alternative would have  
39       no additional impacts on conversion of agricultural lands to non-agricultural lands.

### 1 **5.2.3.2 Air Quality and Greenhouse Gas**

2 Under the No Project Alternative, the reasonably foreseeable development in the area would be the  
3 San Joaquins platform and improvements associated with Phase 1 of the Madera Station Project and  
4 the HSR platform and improvements associated with Phase 2 of the Madera Station Project. Phase 2  
5 has already been environmentally cleared (SJRRRC, 2021), and all air quality related impacts are  
6 mitigated to a less than significant level. Because the HSR platform and improvements associated  
7 with Phase 2 of the Madera Station Project would still be operational, no significant impacts related  
8 to air quality are anticipated under the No Project Alternative.

9 Similar to air quality impacts, the reasonably foreseeable development in the area would be the San  
10 Joaquins platform and improvements associated with Phase 1 of the Madera Station Project and the  
11 HSR platform and improvements associated with Phase 2 of the Madera Station Project. Phase 2 has  
12 already been environmentally cleared (SJRRRC, 2021), and all greenhouse gas related impacts are  
13 would result in a less than significant level. Therefore, under the No Project Alternative GHG  
14 emissions, either directly or indirectly, would not have a significant impact on the environment and  
15 impacts would be less than significant.

### 16 **5.2.3.3 Biological Resources**

17 Under the No Project Alternative, the reasonably foreseeable development in the area would be San  
18 Joaquins platform and improvements associated with Phase 1 of the Madera Station Project and the  
19 the HSR platform and improvements associated with Phase 2 of the Madera Station Project. Phase 2  
20 has already been environmentally cleared (SJRRRC, 2021), and all biological resources related  
21 impacts are mitigated to a less than significant level. No significant impacts related to biological  
22 resources are anticipated under the No Project Alternative.

### 23 **5.2.3.4 Cultural Resources**

24 Under the No Project Alternative, the reasonably foreseeable development in the area would be San  
25 Joaquins platform and improvements associated with Phase 1 of the Madera Station Project and the  
26 the HSR platform and improvements associated with Phase 2 of the Madera Station Project. Phase 2  
27 has already been environmentally cleared (SJRRRC, 2021), and all cultural resources related impacts  
28 are mitigated to a less than significant level. No significant impacts related to cultural resources are  
29 anticipated under the No Project Alternative.

### 30 **5.2.3.5 Energy**

31 Under the No Project Alternative, the reasonably foreseeable development in the area would be San  
32 Joaquins platform and improvements associated with Phase 1 of the Madera Station Project and the  
33 the HSR platform and improvements associated with Phase 2 of the Madera Station Project. Phase 2  
34 has already been environmentally cleared (SJRRRC, 2021), and energy related impacts would result in  
35 a less than significant level. The No Project Alternative would not facilitate a reduction in energy  
36 demand or ridership, which would contribute to increased VMT in the region. Energy consumption  
37 would not be required; therefore, no significant impacts related to energy resources are anticipated  
38 under the No Project Alternative.

### 1 **5.2.3.6 Tribal Cultural Resources**

2 Under the No Project Alternative, the reasonably foreseeable development in the area would be San  
3 Joaquins platform and improvements associated with Phase 1 of the Madera Station Project and the  
4 the HSR platform and improvements associated with Phase 2 of the Madera Station Project. Phase 2  
5 has already been environmentally cleared (SJRRRC, 2021), and all tribal cultural resources related  
6 impacts are mitigated to a less than significant level. No significant impacts related to tribal cultural  
7 resources are anticipated under the No Project Alternative.

### 8 **5.2.3.7 Geology, Soils, and Paleontological Resources**

9 Under the No Project Alternative, the reasonably foreseeable development in the area would be San  
10 Joaquins platform and improvements associated with Phase 1 of the Madera Station Project and the  
11 the HSR platform and improvements associated with Phase 2 of the Madera Station Project. Phase 2  
12 has already been environmentally cleared (SJRRRC, 2021), and all geology, soils, and paleontological  
13 resources related impacts are mitigated to a less than significant level. No significant impacts related  
14 to geology, soils, and paleontological resources are anticipated under the No Project Alternative.

### 15 **5.2.3.8 Hazards and Hazardous Materials**

16 Under the No Project Alternative, the reasonably foreseeable development in the area would be the  
17 San Joaquins platform and improvements associated with Phase 1 of the Madera Station Project and  
18 the HSR platform and improvements associated with Phase 2 of the Madera Station Project. Phase 2  
19 has already been environmentally cleared (SJRRRC, 2021), and all hazards and hazardous materials  
20 related impacts are mitigated to a less than significant level. No significant impacts related to  
21 hazards and hazardous materials are anticipated under the No Project Alternative.

### 22 **5.2.3.9 Transportation**

23 Under the No Project Alternative, the reasonably foreseeable development in the area would be the  
24 San Joaquins platform and improvements associated with Phase 1 of the Madera Station Project and  
25 the HSR platform and improvements associated with Phase 2 of the Madera Station Project. Phase 2  
26 has already been environmentally cleared (SJRRRC, 2021), and all transportation related impacts are  
27 mitigated to a less than significant level. No significant impacts related to transportation are  
28 anticipated under the No Project Alternative.

## 1 **5.3 Environmentally Superior Alternative**

2 CEQA Guidelines Section 15126.6(e)(2) require an EIR to identify an “environmentally superior  
3 alternative” from among the alternatives considered to the Project. The guidelines also state that, if  
4 the environmentally superior alternative is the No Project Alternative, then the EIR must also  
5 identify an environmentally superior alternative among the other alternatives.

6 The No Project Alternative would avoid new construction impacts to agricultural lands, biological  
7 resources, cultural resources, hazards and hazardous materials, and transportation. Therefore,  
8 relative to the Project, the No Project Alternative would be the environmentally superior alternative.  
9 Although the No Project Alternative would result in the least amount of environmental impacts, this  
10 alternative would not meet the goals and objectives of the Project such as reduced VMT and GHG  
11 emissions, and enhanced transportation access and connection to the regional transportation  
12 network. As noted above, when the No Project Alternative is the environmentally superior  
13 alternative, the EIR must also identify the environmentally superior alternative among the other  
14 alternatives.

15 The "environmentally superior alternative" is the Project as there are no feasible alternatives to the  
16 Project, and it meets all engineering requirements for an HSR station to operate. Furthermore, the  
17 Project would improve air quality, greenhouse gases, and overall traffic VMT in the region.