

7. Alternatives to the Proposed Project

7.1 INTRODUCTION

7.1.1 Purpose and Scope

This chapter presents the alternatives analysis for the McKinley Elementary School Campus Master Plan Project (Proposed Project), as required by the California Environmental Quality Act (CEQA). The discussion includes an explanation of the methodology used to select alternatives to the Proposed Project, with the intent of identifying potentially feasible alternatives that could avoid or substantially lessen the significant impacts identified for the Proposed Project while still meeting most of the basic Project objectives. This chapter identifies a reasonable range of alternatives that meet these criteria, and these alternatives are evaluated with respect to minimizing adverse environmental effects as compared to the Proposed Project. It describes other alternatives and alternative concepts that were considered but eliminated from detailed consideration and reasons for their elimination. For the alternatives selected for analysis, this chapter evaluates the impacts of the alternatives against baseline environmental conditions and compares the potential impacts of the alternatives with those of the Proposed Project. Finally, as required under CEQA Guidelines § 15126.6(e), based on this analysis, this chapter then discusses the Environmentally Superior Alternative.

CEQA requires that an Environmental Impact Report (EIR) include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project and evaluate the comparative merits of the alternatives” (CEQA Guidelines, § 15126.6[a]). As required by CEQA, this chapter identifies and evaluates potential alternatives to the Proposed Project.

Section 15126.6 of the CEQA Guidelines explains the foundation and legal requirements for the alternatives analysis in an EIR. Key provisions are:

- “[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” (§ 15126.6[b].)
- “The specific alternative of ‘no project’ shall also be evaluated along with its impact.” (§ 15126.6[e][1].)
- “The no project analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, 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. If

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the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” (§ 15126.6[e][2].)

- “The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.” (15126.6[f].)
- “Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries..., and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).” (§ 15126.6[f][1].)
- “Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.” (§ 15126.6[f][2][A].)
- “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.” (§ 15126.6[f][3].)

For each development alternative, this analysis:

- Describes the alternative.
- Analyzes the impact of the alternative as compared to the proposed project.
- Identifies the impacts of the project that would be avoided or lessened by the alternative.
- Assesses whether the alternative would meet most of the basic project objectives.
- Evaluates the comparative merits of the alternative and the project.

According to section 15126.6(d) of the CEQA Guidelines, “[i]f an alternative would cause...significant effects in addition those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.”

7.2 FACTORS CONSIDERED WHEN DEVELOPING ALTERNATIVES

This section describes the basis for determining the range of CEQA alternatives and identifies the specific alternatives that are analyzed in this Draft EIR (DEIR). The primary factors considered when determining feasible alternatives to the Proposed Project are the identified project objectives and those impacts that have been identified for the Proposed Project. Therefore, these two considerations are summarized below.

7.2.1 Project Objectives

As described in Section 3.3, *Project Objectives*, the following objectives have been established for the Proposed Project and will aid decision makers in their review of the Proposed Project, the Proposed Project alternatives, and associated environmental impacts.

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1. Provide properly sized learning environments to accommodate students and the variety of 21st century learning activities at the McKinley ES campus.
2. Advance educational facilities to support 21st century learning and properly support the enrollment at the McKinley ES campus.
3. Improve learning at McKinley ES by replacing undersized and inflexible facilities with larger, functional flexible spaces that accommodate modern, diverse learning styles and allow for variable uses such as, rotational learning within the classroom, project-based learning experiences that allow simultaneous individualized, small group, and large group instruction.
4. Provide enhanced, modern, and functional support spaces, such as libraries, cafeteria, labs, maker spaces, and other student services, that promote whole child development.
5. Organize the campus to provide safe student circulation.
6. Reorganize open space and foster intercampus circulation.
7. Provide safe and secure schools.
8. Maintain the campus' existing student capacity.

7.3 SUMMARY OF SIGNIFICANT EFFECTS OF THE PROPOSED PROJECT

The Proposed Project, which involves implementation of a Campus Master Plan, would be constructed in three phases and would occur over approximately 5.7 acres of the 6.48-acre District-owned campus. Redevelopment and modernization of McKinley ES includes the demolition and removal of some existing structures, renovation of structures to remain, and construction of two new buildings and outdoor facilities. Eleven existing portable classrooms (B1 through B11), playground restrooms, one modular building (Building D), and one elevator (serving Building B and C) would be selectively demolished and removed as part of the Proposed Project. Two new classroom buildings would be constructed to replace the 11 portable classrooms to be removed. The existing library and Building C would undergo renovations. Improvements to outdoor recreational areas, circulation improvements including a new drop-off/pick-up area along Chelsea Avenue, and relocation of the parking lot would also be implemented.

The following impacts have been identified for the Proposed Project, as discussed in Chapter 5, *Environmental Analysis*, of this DEIR.

7.3.1 Significant and Unavoidable Impacts

This DEIR did not identify any significant and unavoidable adverse impacts, as defined by CEQA, that would result from implementation of the Proposed Project.

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7.3.2 Significant Impacts That Can Be Mitigated to Less Than Significant

- **Impact 5.3-2:** The Proposed Project would not cause a substantial adverse change in the significance of an archaeological resources pursuant to section 15064.5.
- **Impact 5.5-1:** Buildout of the Proposed Project would not directly or indirectly destroy a unique paleontological resource.
- **Impact 5.7-2:** The Proposed Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
- **Impact 5.7-3:** The Proposed Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of an existing or proposed school. [Threshold H-3]
- **Impact 5.10-1:** Construction activities would result in temporary noise increases in the vicinity of the Proposed Project in excess of existing established standards. Operational activities would not result in permanent or temporary increase in ambient noise levels in excess of existing established standards.
- **Impact 5.10-2:** Temporary construction activities would potentially create excessive groundborne vibration and groundborne noise at sensitive receptors.
- **Impact 5.12-3:** The Proposed Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- **Impact 5.12-4:** The Proposed Project would not result in inadequate emergency access.

7.4 ALTERNATIVES CONSIDERED AND REJECTED DURING THE SCOPING/PROJECT PLANNING PROCESS

The following is a discussion of the alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in this EIR.

7.4.1 Alternative Development Area

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR. (CEQA Guidelines § 15126.6[f][2][A].)

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The Proposed Project by design is intended for the McKinley ES campus. Consequently, an alternative off-site location is not a feasible alternative and would not meet the project objectives. Certain impacts that are identified as being potentially significant under the Proposed Project are due primarily to construction-related activity such as inadvertent discovery of significant archaeological resources during excavation and noise impacts. These impacts could potentially occur regardless of the Proposed Project's location. For these reasons, an alternative that is in another location within the District is not addressed in this chapter. Because the Proposed Project's Site is already developed as a school, constructing a new school on a different site would likely increase environmental impacts. For these reasons, this alternative was not considered further.

7.5 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

The following three alternatives have been determined to represent a reasonable range of alternatives that have the potential to feasibly attain most of the basic objectives of the Proposed Project and may avoid or substantially lessen any of the significant effects of the Proposed Project or ameliorate community concerns. The following alternatives are analyzed in detail in the following sections.

- **Alternative 1:** No-Project Alternative
- **Alternative 2:** Alternative Location on North Campus
- **Alternative 3:** Alternate Location on Santa Monica Boulevard Frontage

7.6 NO PROJECT ALTERNATIVE

7.6.1 Description

The CEQA Guidelines require the analysis of a No Project Alternative. Under CEQA, the No Project Alternative must consider the effects of not approving the Proposed Project. The No Project Alternative describes the environmental conditions that exist at the time that the environmental analysis commences, as well as what would reasonably be expected to occur in the foreseeable future if the Proposed Project were not approved (CEQA Guidelines, § 15126.6(e)(2)).

Under the No Project Alternative, the District would not approve any portion of the Proposed Project on the McKinley ES campus, and none of the mitigation measures identified within this DEIR would be necessary. No demolition would occur under the No Project Alternative, because the existing structures on the Proposed Project's Site would be retained. Under the No Project Alternative, it is assumed that the reasonably foreseeable future at the campus would be the continued occupation of the existing buildings and use of the playgrounds within the McKinley ES campus as in current conditions. McKinley ES would not be redeveloped and modernized, and existing buildings would be used by students as needed (portable buildings and Building D) or remain unoccupied. The school would continue to operate under its current conditions, and no changes would take place.

7.6.2 Relationship to Project Objectives

Under the No Project Alternative, none of the District's objectives for the Proposed Project would be met.

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7.6.3 Comparison Analysis of Environmental Effects

7.6.3.1 AESTHETICS

Under this alternative, no structural or any other visual changes to the existing McKinley ES campus facilities would occur. There would be no changes to the physical environment as it relates to aesthetic resources, including light and glare, and no impacts would occur. Overall, the No Project Alternative would avoid the less-than-significant aesthetic impacts of the Proposed Project as well as the less-than-significant light and glare impacts, and impacts under this alternative would be less than those of the Proposed Project.

7.6.3.2 AIR QUALITY

No construction would occur under this alternative; therefore, no construction-related air quality impacts would occur. Construction-related impacts would be less than the less-than-significant impacts of the Proposed Project. Operation (i.e., student enrollment, staffing, and general operational characteristics) under this alternative would remain similar to existing conditions. As discussed in Chapter 3, *Project Description*, the Proposed Project would not change enrollment capacity and staffing of McKinley ES. Therefore, operational-related air quality impacts under this alternative would be similar to the less-than-significant impacts of the Proposed Project.

7.6.3.3 CULTURAL RESOURCES

The No Project Alternative would not demolish any buildings and would not develop new buildings on-site adjacent to the historic district. The No Project Alternative impacts to historic resources would be less than the Proposed Project's less-than-significant impacts. The No Project Alternative would avoid any ground-disturbing activities. Therefore, potential construction-related impacts to subsurface unknown archaeological resources would be avoided and impacts would be less than the Proposed Project. Overall, the No Project Alternative would avoid the less-than-significant (after mitigation) cultural resources impacts of the Proposed Project. Impacts under this alternative would be less than those of the Proposed Project.

7.6.3.4 ENERGY

Under this alternative, construction of new buildings would not occur. Therefore, no construction-related energy consumption would occur, and construction-related impacts to energy would be less than the Proposed Project. The alternative would continue to operate in its existing condition as an elementary school. Therefore, energy demand for electricity and fuel consumption would remain as is and would not affect local or state renewable energy plans. Potential operational-related impacts to energy would be similar to the less-than-significant impacts of the Proposed Project, since neither this alternative nor the Proposed Project would increase student enrollment capacity nor staffing.

7.6.3.5 GEOLOGY AND SOILS

No new construction activities, including grading, would occur under the No Project Alternative. Therefore, potential construction-related impacts to subsurface unknown paleontological resources would be avoided and impacts would be less than the Proposed Project. Overall, the No Project Alternative would avoid the less-

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than-significant after mitigation geology and soil impacts of the Proposed Project and impacts under this alternative would be less than those of the Proposed Project.

7.6.3.6 GREENHOUSE GAS EMISSIONS

Under this alternative, no demolition would occur, and no new construction and modernization would occur. Therefore, no construction-related greenhouse gas (GHG) emissions would occur, and this alternative's GHG emissions would be less than the Proposed Project's less-than-significant impact. The Proposed Project's Site would continue to operate as an elementary school, and GHG emissions would remain unchanged from existing conditions. As with the Proposed Project, the No Project Alternative would not conflict with any applicable plans or policies. Overall, the No Project Alternative would avoid the less-than-significant GHG emissions impacts of the Project and impacts under this alternative would be less than those of the Proposed Project.

7.6.3.7 HAZARDS AND HAZARDOUS MATERIALS

Because no development would occur under the No Project Alternative, construction impacts related to hazards or hazardous materials would be less than the Proposed Project. The alternative would continue to use, transport, and handle small quantities of hazardous materials typical of a school during operation (such as cleaning supplies, science laboratory chemicals, pesticides and landscaping hazardous materials). Therefore, impacts from hazardous materials during operation would be less than significant, similar to the Proposed Project.

7.6.3.8 HYDROLOGY AND WATER QUALITY

Water quality conditions, groundwater supplies, drainage patterns, and surface water runoff would remain the same under the No Project Alternative because no construction or new development would occur. This alternative would not introduce new sources of water pollutants from the construction phase, and the impacts would be less than the Proposed Project during construction. This alternative would continue to operate as an elementary school with the same student enrollment capacity and staffing as existing conditions and the Proposed Project. Therefore, the impacts for the operational phase would be slightly reduced compared to the less-than-significant impacts of the Proposed Project.

7.6.3.9 LAND USE AND PLANNING

Because no development would occur under the No Project Alternative, no changes to uses nor buildings on-site would occur. Therefore, the No Project Alternative would not conflict with any applicable plans. The No Project Alternative's operational impacts would be less than the less-than-significant impacts of the Proposed Project.

7.6.3.10 NOISE

No construction noise impacts would occur under this alternative; therefore, the construction noise impacts would be less than the Proposed Project. Specifically, this alternative would avoid the construction noise impacts to on-site school receptors and would avoid construction vibration impacts. Under this alternative, the campus would continue to operate as an elementary school campus, and operational noise would not increase at the

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residences adjacent to the Proposed Project's Site. The No Project Alternative and the Proposed Project would have similar less-than-significant operational noise impacts. Overall, the No Project Alternative would result in less noise impacts than the Proposed Project, and construction noise and vibration impacts would be avoided.

7.6.3.11 RECREATION

Neither the Proposed Project nor the No Project Alternative increase student capacity and therefore would not increase the demand for new or expanded recreational facilities. This alternative would avoid the Proposed Project's less-than-significant recreational facilities impacts during construction. This alternative would not benefit from the additional recreational opportunities proposed under the Proposed Project, such as the reconfigured playfields and open space throughout the campus. The staffing and student enrollment would not change under this alternative and there would be no increased use of recreational facilities. The No Project Alternative would result in slightly reduced recreational impacts compared to the Proposed Project.

7.6.3.12 TRANSPORTATION

There would be no construction under this alternative, and therefore there would be no impacts as a result of construction-related traffic. The less-than-significant after mitigation impacts of the Proposed Project would be reduced under the No Project Alternative. The No Project Alternative would not reconfigure parking lots, improve drop-off/pick-up areas, or improve pedestrian circulation. Less-than-significant impacts related to vehicle miles traveled (VMT) would be the same as the Proposed Project, as the number of staff and students would not change. Therefore, the impacts related to traffic would be less than or similar to the Proposed Project.

7.6.4 Conclusion

This alternative would lessen environmental impacts related to construction in all topic areas, since no construction would occur under this alternative. The No Project Alternative would not result in any temporary construction impacts identified for the Proposed Project. This alternative would not cause operational impacts associated with aesthetics and cultural resources. Because the Proposed Project would not change operational conditions of the campus, including student enrollment and staffing, the No Project Alternative would result in similar operational impacts in the areas of air quality, energy, hazards and hazardous materials, hydrology and water quality.

The No Project Alternative does not meet any of the Project's objectives. Additionally, this alternative would not realize any of the environmentally beneficial outcomes of the Proposed Project. Overall, the No Project Alternative results in reduced impacts throughout all environmental topics and avoidance of any significant and unavoidable impact.

7.7 ALTERNATIVE 2: ALTERNATIVE LOCATION ON NORTH CAMPUS

7.7.1 Description

Under this alternative, the proposed two-story classroom buildings that would be constructed during Phase 3 of the Proposed Project, would be located at alternate locations on the campus, including at the northeast

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portion of the campus near the intersection Chelsea Avenue and Arizona Avenue, along the northern boundary near Arizona Avenue, at the northwest portion of the campus near the intersection of Arizona Avenue and 23rd Court, and along the western portion of the campus near 23rd Court (see Figure 7-1, *Alternative Location on North Campus*).

7.7.2 Relationship to Project Objectives

Alternative 2, *Alternative Location on North Campus*, would meet project objectives, except for Objective 5, organize the campus to provide safe student circulation, and Objective 6, reorganize open space and foster intercampus circulation. Under this alternative the new classroom buildings would not be near the instructional core of the campus and would result in students traveling further from drop-off/pick-up locations.

7.7.3 Comparison Analysis of Environmental Effects

7.7.3.1 AESTHETICS

Since Alternative 2 would largely result in the same buildout as the Proposed Project, it would have similar impacts as the Proposed Project related to scenic quality and community character. Compared to the Proposed Project, this alternative would have similar impacts related to light and glare as the Proposed Project. Overall, aesthetic impacts would be similar to the Proposed Project's less-than-significant impacts.

7.7.3.2 AIR QUALITY

Alternative 2 would result in similar construction activities as the Proposed Project, including equipment, earth-moving activities, construction vehicle trips, material consumption, etc.— and in overall duration. Therefore, this alternative would result in similar emissions of criteria pollutants during the construction phases compared to the Proposed Project.

This alternative results in the same buildout as the Proposed Project with the exception of the location of the proposed two-story building. This alternative would have the same enrollment capacity and staffing as the Proposed Project, and air quality from vehicles trips would remain less than significant, as with the Proposed Project. Air quality impacts during operation of this alternative would remain the same compared to the Proposed Project. Alternative 2 would not reduce the impacts to air quality compared to the Proposed Project, and air quality impacts associated with this alternative would be similar to that of the Proposed Project.

7.7.3.3 CULTURAL RESOURCES

Alternative 2 would still construct two two-story classroom buildings outside of the historic district on the campus. Alternative 2 would result in similar less-than-significant impacts related to historical resources compared to the Proposed Project. Alternative 2 would result in similar overall construction activities, including excavation, grading, and other earthwork. Therefore, the potential to encounter subsurface archaeological resources would be similar to the Proposed Project. Similar to the Proposed Project, **Mitigation Measure CUL-1** would be required to reduce impacts to less than significant. This alternative would have a similar impact to cultural resources compared to the Proposed Project.

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7.7.3.4 ENERGY

Under Alternative 2, energy consumption during construction would be similar to the Proposed Project. During operation, this alternative would not affect transportation energy and fuel consumption, and electricity demand under this alternative would be similar to the Proposed Project since the two-story building proposed for the Project would still be constructed, in another location of the campus. Therefore, electricity demand and fuel consumption during operation would be similar compared to the Proposed Project. Overall, energy impacts would result in similar impacts compared to the Proposed Project's less-than-significant impact.

7.7.3.5 GEOLOGY AND SOILS

Alternative 2 would occur on the same Proposed Project's Site. Construction activities and earthwork would be similar under this alternative compared to the Proposed Project; thus, the potential to uncover unknown subsurface paleontological resources would be similar to the Proposed Project. Therefore, this alternative also requires the implementation of **Mitigation Measure GEO-1** to reduce impacts to a less-than-significant level. Like the proposed project, impacts would be less than significant with mitigation.

7.7.3.6 GREENHOUSE GAS EMISSIONS

Under Alternative 2, construction activities on the campus would be similar to the Proposed Project; thus, energy consumption and GHG emissions would be similar to the Proposed Project. During operation, this alternative would result in similar GHG emissions as with the Proposed Project. Therefore, the impacts associated with GHG emissions would be similar to the Proposed Project's less-than-significant impact.

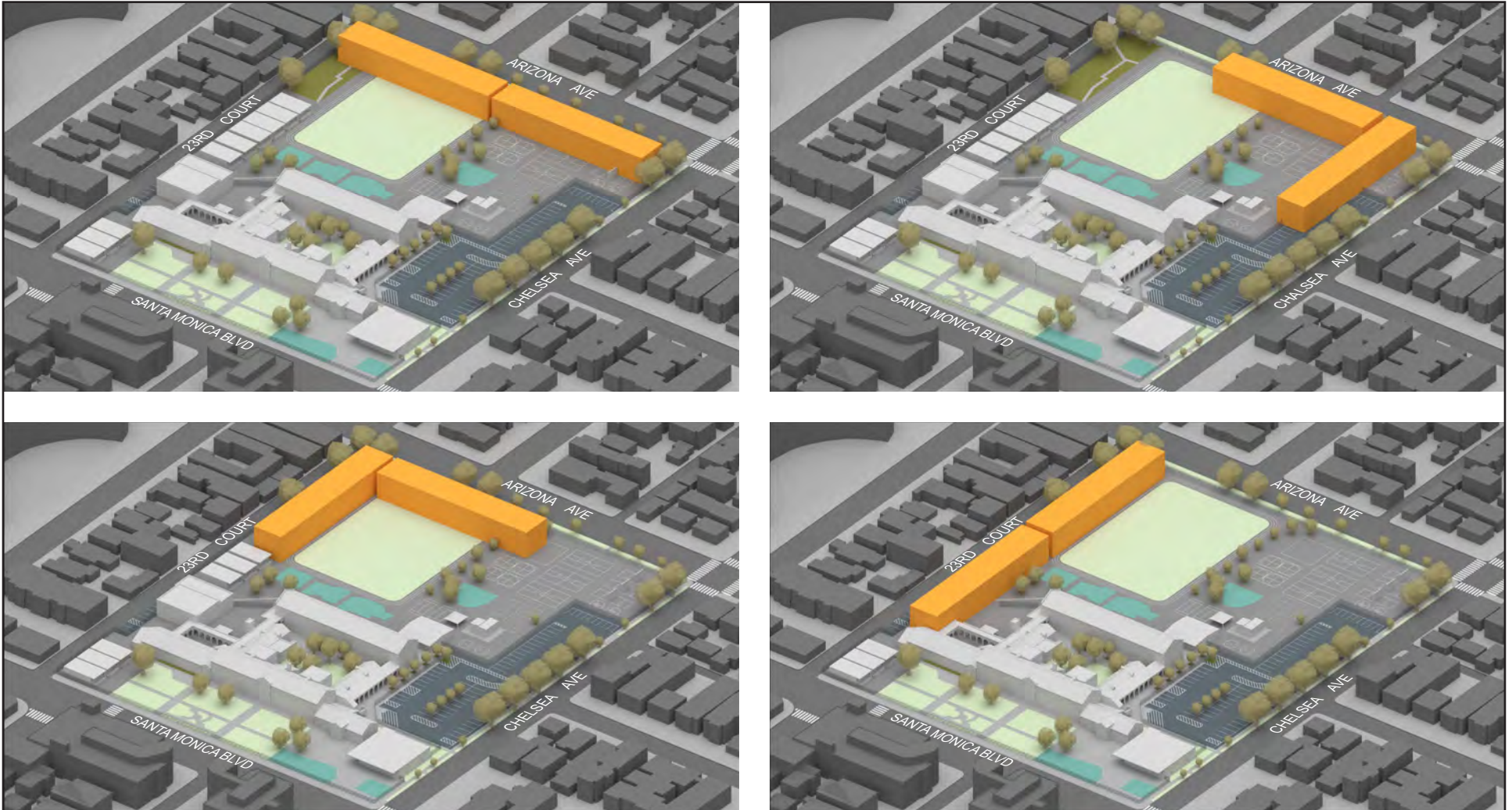
7.7.3.7 HAZARDS AND HAZARDOUS MATERIALS

Development under Alternative 2 would require demolition and grading. Potential hazards would occur from the accidental release of hazardous materials due to potential exposure to impacted soils and hazardous building materials. However, impacts from hazards and hazardous materials would be less than significant with the implementation of **Mitigation Measures HAZ-1** and **HAZ-2**, similar to the Proposed Project. As with the Proposed Project, the transport, use, and storage of hazardous materials would be mitigated by comprehensive regulations. The overall hazards impacts associated with this alternative would be less than significant with implementation of **Mitigation Measures HAZ-1** and **HAZ-2**, and therefore, similar to the Proposed Project.

7.7.3.8 HYDROLOGY AND WATER QUALITY

Similar to the Proposed Project, construction and operation of Alternative 2 could generate pollutants that impact water quality. However, similar to the Proposed Project, a Construction General Permit and stormwater pollution prevention plan (SWPPP) would be required. Implementation of best management practices (BMPs) in the SWPPP would ensure water quality impacts are minimized to less than significant levels. Adherence to existing regulations, implementation of required BMPs, and final design specifications would ensure impacts to hydrology and water quality are less than significant. Similar to the Proposed Project, Alternative 2 would not change current enrollment or staffing, and therefore, overall water demand is not expected to increase. Overall, impacts would be similar to the Proposed Project's.

Figure 7-1 - Alternative Location on North Campus



Source: Favaro, 2022.



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7.7.3.9 LAND USE AND PLANNING

The Proposed Project would be constructed under this alternative, with the exception of the location of the proposed two-story building. Because the proposed two-story building would still be constructed within the school boundaries, Alternative 2 would not change the impacts associated with land use and planning, and impacts would be less than significant and similar to the Proposed Project.

7.7.3.10 NOISE

Development under Alternative 2 would still require construction and associated site improvements. While construction would not occur only across residences along Chelsea Avenue, construction would occur on portions of the campus along Chelsea Avenue or across residences along 23rd Court. As with the Proposed Project, it is anticipated that construction noise and vibration impacts would be less than significant with the implementation of **Mitigation Measures N-1** and **N-2**. Like the Proposed Project, operational impacts would be less-than-significant. Overall, Alternative 2 would result in similar noise impacts during construction and operation compared to the Proposed Project.

7.7.3.11 RECREATION

Alternative 2 would have the same enrollment capacity and staffing as the Proposed Project. Additionally, this alternative would have the same buildout as the Proposed Project, with the exception of the location of the proposed two-story building. Therefore, this alternative would result in similar impacts to recreational facilities as the Proposed Project.

7.7.3.12 TRANSPORTATION

Alternative 2 would require the mobilization of workers, vendors, equipment, and haul trucks to and from the campus during construction. Similar to the Proposed Project, Alternative 2 could require temporary closures of the public right-of-way adjacent to the campus or increase safety hazards due to construction vehicles entering and exiting the campus. Construction of Alternative 2 would result in traffic hazard impacts and would require **Mitigation Measure T-1** to reduce impacts. Overall, Alternative 2 would result in similar transportation impacts during construction compared to the Proposed Project.

Implementation of Alternative 2 would not provide the drop-off/pick-up modifications along Chelsea Avenue, as described in the Proposed Project. Alternative 2 would not improve student safety and circulation on-campus because the new classrooms buildings would be disconnected from the instructional core of the campus. Alternative 2 would reduce student safety during drop-off/pick-up because students would be required to walk across the campus. Overall, Alternative 2 would result in greater operational circulation and pedestrian safety hazards compared to the Proposed Project.

7.7.4 Conclusion

Alternative 2 would have similar impacts as the Proposed Project for aesthetics, air quality, cultural resources, energy, greenhouse gas emissions, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, recreation, and transportation. Alternative 2 would meet Objectives 1

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through 4, and 7 through 8. This alternative would not result in the full benefits of reconfiguring the campus to provide safe student circulation (Objective 5), and reorganizing open space and foster intercampus circulation (Objective 6).

7.8 ALTERNATIVE LOCATION ON SANTA MONICA BOULEVARD FRONTAGE

7.8.1 Description

Under this alternative, the proposed two-story classroom buildings, would be located within the existing Santa Monica Boulevard Quad along Santa Monica Boulevard (see Figure 7-2, *Alternative Location on Santa Monica Boulevard Frontage*).

7.8.2 Relationship to Project Objectives

Alternative 3, *Alternative Location on Santa Monica Boulevard Frontage*, would meet all project objectives, except for Objective 5, organize the campus to provide safe student circulation, and Objective 6, reorganize open space and foster intercampus circulation.

7.8.3 Comparison Analysis of Environmental Effects

7.8.3.1 AESTHETICS

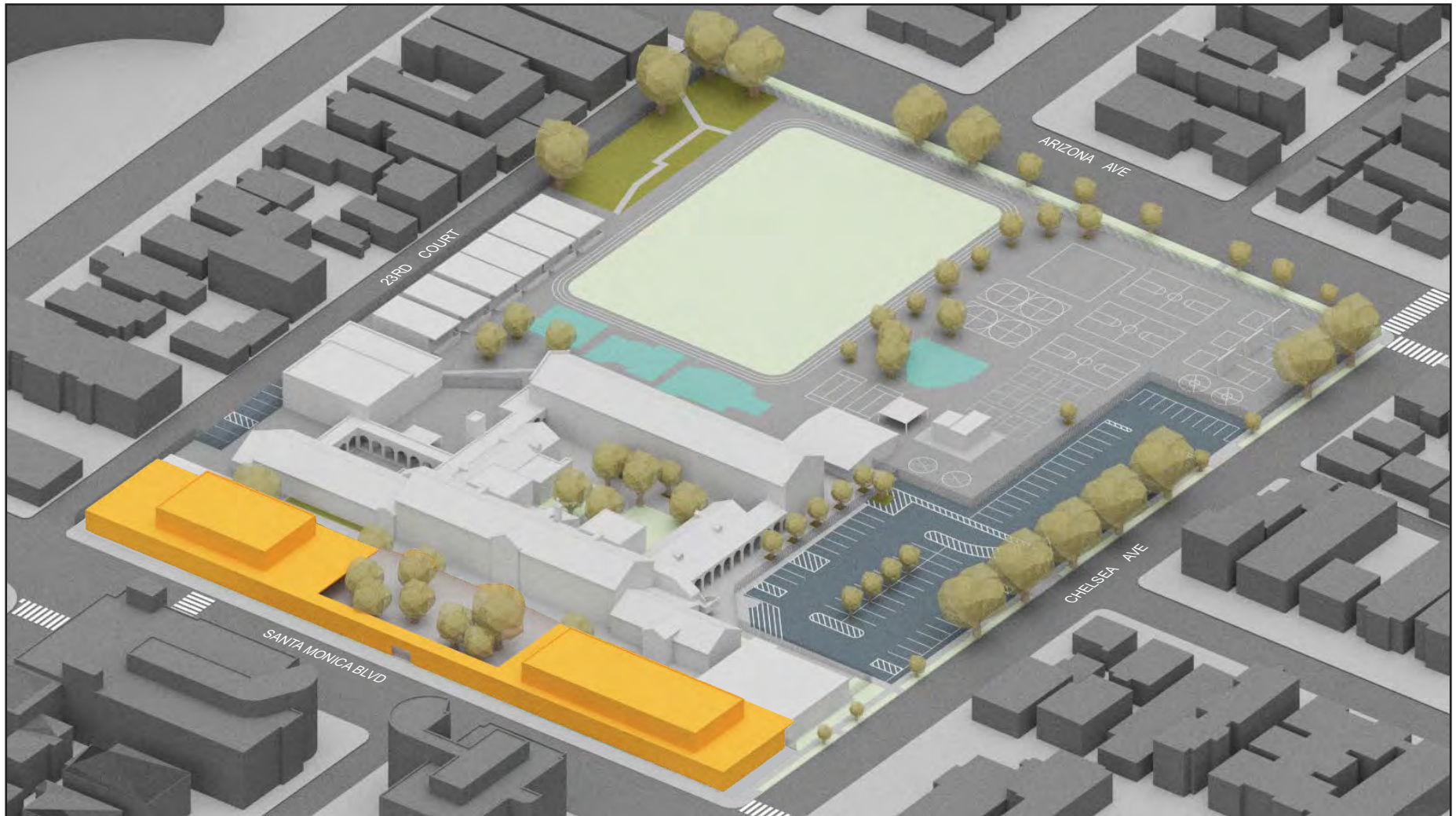
Alternative 3 would construct a new classroom building in front of the existing main Santa Monica Boulevard frontage. The new classroom building would alter the existing views of the McKinley ES Building C, Santa Monica Boulevard Quad, and would alter the existing setback of the Santa Monica Boulevard Quad from Santa Monica Boulevard which is considered a character defining feature. Compared to the Proposed Project, this alternative would have similar impacts related to light and glare as the Proposed Project. Overall, aesthetic impacts would be similar to the Proposed Project's less-than-significant impacts.

7.8.3.2 AIR QUALITY

Alternative 3 would result in similar construction activities as the Proposed Project, including equipment, earth-moving activities, construction vehicle trips, material consumption, etc.— and in overall duration. Therefore, this alternative would result in similar emissions of criteria pollutants during the construction phases compared to the Proposed Project.

This alternative results in the same buildout as the Proposed Project with the exception of the location of the proposed two-story building. This alternative would have the same enrollment capacity and staffing as the Proposed Project, and air quality from vehicles trips would remain less than significant, as with the Proposed Project. Air quality impacts during operation of this alternative would remain the same compared to the Proposed Project. Alternative 3 would not reduce the impacts to air quality compared to the Proposed Project, and air quality impacts associated with this alternative would be similar to that of the Proposed Project.

Figure 7-2 - Alternative Location on Santa Monica Boulevard Frontage



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7.8.3.3 CULTURAL RESOURCES

Alternative 3 would construct new two-story classroom buildings within the historic district on the campus. Alternative 3 would construct a new classroom building in front of the existing main Santa Monica Boulevard frontage. The Santa Monica Boulevard Quad is a main character defining feature of the historic district because it reflects the importance given to outdoor spaces in school design during the period of significance (1923 to 1937). The existing setback of the Santa Monica Boulevard Quad from Santa Monica Boulevard contributes to the integrity to the historic district due to its location, design, feeling, and association. The new classroom building would alter the existing views of the McKinley ES Building C and Santa Monica Boulevard Quad. This alternative would also alter the existing setback of the Santa Monica Boulevard Quad from Santa Monica Boulevard which is considered a character defining feature and it would alter the Santa Monica Boulevard Quad feature. This would result in potential impacts to the integrity of the historic district. This alternative would result in similar overall construction activities, including excavation, grading, and other earthwork. Therefore, the potential to encounter subsurface archaeological resources would be similar to the Proposed Project. Similar to the Proposed Project, **Mitigation Measure CUL-1** would be required to reduce impacts to less than significant. This alternative would have greater impacts to cultural resources, specifically to historical resources, compared to the Proposed Project.

7.8.3.4 ENERGY

Under Alternative 3, energy consumption during construction would be similar to the Proposed Project. During operation, this alternative would not affect transportation energy and fuel consumption, and electricity demand under this alternative would be similar to the Proposed Project since the two-story building proposed for the Project would still be constructed, in another location of the campus. Therefore, electricity demand and fuel consumption during operation would be similar compared to the Proposed Project. Overall, energy impacts would result in similar impacts compared to the Proposed Project's less-than-significant impact.

7.8.3.5 GEOLOGY AND SOILS

Alternative 3 would occur on the same Proposed Project's Site. Construction activities and earthwork would be similar under this alternative compared to the Proposed Project; thus, the potential to uncover unknown subsurface paleontological resources would be similar to the Proposed Project. Therefore, this alternative also requires the implementation of **Mitigation Measure GEO-1** to reduce impacts to a less-than-significant level. Overall, the impact of Alternative 3 related to geology and soils would be similar to the Proposed Project.

7.8.3.6 GREENHOUSE GAS EMISSIONS

Under Alternative 3, construction activities on the campus would be similar to the Proposed Project; thus, energy consumption and GHG emissions would be similar to the Proposed Project. During operation, this alternative would result in similar GHG emissions as with the Proposed Project. Alternative 3's VMT would be same as the Proposed Project. Therefore, the impacts associated with GHG emissions would be similar to the Proposed Project's less-than-significant impact.

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7.8.3.7 HAZARDS AND HAZARDOUS MATERIALS

Development under Alternative 3 would require demolition and grading. Potential hazards would occur from the accidental release of hazardous materials due to potential exposure to impacted soils and hazardous building materials. However, impacts from hazards and hazardous materials would be less than significant with the implementation of **Mitigation Measures HAZ-1** and **HAZ-2**, similar to the Proposed Project. As with the proposed project, the transport, use, and storage of hazardous materials would be mitigated by comprehensive regulations. The overall hazards impacts associated with this alternative would be less than significant with implementation of **Mitigation Measures HAZ-1** and **HAZ-2**, and therefore, similar to the Proposed Project.

7.8.3.8 HYDROLOGY AND WATER QUALITY

Similar to the Proposed Project, construction and operation of Alternative 3 could generate pollutants that impact water quality. However, similar to the Proposed Project, a Construction General Permit and stormwater pollution prevention plan (SWPPP) would be required. Implementation of best management practices (BMPs) in the SWPPP would ensure water quality impacts are minimized to less than significant levels. Adherence to existing regulations, implementation of required BMPs, and final design specifications would ensure impacts to hydrology and water quality are less than significant. Similar to the Proposed Project, Alternative 3 would not change current enrollment or staffing, and therefore, overall water demand is not expected to increase. Overall, impacts would be similar to the Proposed Project's.

7.8.3.9 LAND USE AND PLANNING

The Proposed Project would be constructed under this alternative, with the exception of the location of the proposed two-story building. Because the proposed two-story building would still be constructed within the school boundaries, Alternative 3 would not change the impacts associated with land use and planning, and impacts would be less than significant and similar to the Proposed Project.

7.8.3.10 NOISE

Development under Alternative 3 would still require construction and associated site improvements. As with the Proposed Project, it is anticipated that construction noise and vibration impacts would be less than significant with the implementation of **Mitigation Measures N-1** and **N-2**. Like the Proposed Project, operational impacts would be less-than-significant. Overall, Alternative 3 would result in similar noise impacts during construction and operation compared to the Proposed Project.

7.8.3.11 RECREATION

Alternative 3 would have the same enrollment capacity and staffing as the Proposed Project. Additionally, this alternative would have the same buildout as the Proposed Project, with the exception of the location of the proposed two-story building. Therefore, this alternative would result in similar impacts to recreational facilities as the Proposed Project.

7. Alternatives to the Proposed Project

7.8.3.12 TRANSPORTATION

Alternative 3 would require the mobilization of workers, vendors, equipment, and haul trucks to and from the campus during construction. Similar to the Proposed Project, Alternative 3 could require temporary closures of the public right-of-way adjacent to the campus or increase safety hazards due to construction vehicles entering and exiting the campus. Construction of Alternative 3 would result in traffic hazard impacts and would require **Mitigation Measure T-1** to reduce impacts. Overall, Alternative 3 would result in similar transportation impacts during construction compared to the Proposed Project.

Since the new structures would be located along Santa Monica Boulevard, implementation of Alternative 3 would not include the drop-off/pick-up modifications along Chelsea Avenue, as described in the Proposed Project, because the main entrance of the campus would remain at Santa Monica Boulevard. Therefore, this could result in increased traffic and pedestrian safety issues during drop-off/pick-up along the Santa Monica Boulevard.

Overall, Alternative 3 would result in greater operational circulation and pedestrian safety hazards compared to the Proposed Project.

7.8.4 Conclusion

Alternative 3 would have similar impacts as the Proposed Project for aesthetics, air quality, energy, greenhouse gas emissions, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, recreation, and transportation. Alternative 3 would result in greater impacts to historical resources. Alternative 3 would meet Objectives 1 through 4, and 7 through 8. This alternative would not result in the full benefits of reconfiguring the campus to provide safe student circulation (Objective 5), and reorganizing open space and foster intercampus circulation (Objective 6).

7.9 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

“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” (CEQA Guidelines, § 15126.6[c]).

An EIR must identify an “environmentally superior” alternative, and where the No Project Alternative is identified as environmentally superior, the EIR must identify an environmentally superior alternative from the others evaluated. Each alternative’s environmental impacts are compared to the Proposed Project and determined to result in either reduced impacts compared to the Proposed Project, the same or similar impacts as the Proposed Project, or a more severe impact than the Proposed Project. Alternative 2 (Alternate Location on North Campus) was identified as “environmentally superior” to the Proposed Project.

Alternative 2 has the least impact on the environment because it would not alter the public view of the existing McKinley ES campus from Chelsea Avenue. However, this Alternative would not generate the full environmental enhancements under the Proposed Project. These factors will be considered by the SMMUSD decision makers in determining whether to approve the Proposed Project or one of the alternatives identified.

7. Alternatives to the Proposed Project

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