

# 7. Alternatives to the Proposed Project

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## 7.1 INTRODUCTION

### 7.1.1 Purpose and Scope

The California Environmental Quality Act (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 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]).

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- “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.”

### 7.1.2 Project Objectives

As described in Section 3.2 of this EIR, the following objectives have been established for the Proposed Project and will aid decision makers in their review of the Project, the Project alternatives, and associated environmental impacts.

- Improve student safety and campus security systems, including security fencing, security cameras, emergency communications systems, smoke detectors, fire alarms, and sprinklers.
- Repair or replace deteriorating roofs, plumbing, heating, ventilation, and electrical systems.
- Provide the equipment and educational technology needed to support high-quality instruction in science, reading, music, arts, and math.
- Improve access to school facilities for students with disabilities.
- Ensure that children’s play areas meet current health and safety standards.
- Provide interim school housing in order to provide a safe, consistent environment for student learning while school buildings are being modernized.
- Complete all construction in the safest possible manner.
- Complete all construction with the least amount of disruption or inconvenience to the educational process.

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- Complete all construction in the most efficient and economical manner possible in order to maximize return on investment.
- Maximize control of the construction process by minimizing the potential for problems and enabling more solutions should problems materialize.
- Complete all work as quickly as possible.

### 7.2 ALTERNATIVES CONSIDERED AND REJECTED DURING THE SCOPING/PROJECT PLANNING PROCESS

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

#### 7.2.1 Alternative Development Areas

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[5][B][1]). The modernizations are specific to each school and cannot be performed at other areas. Therefore, alternative development areas would not be applicable.

The modernizations would require two school sites in the District to provide interim housing for elementary and middle school students. Other District facilities that are currently leased to private schools were considered but rejected. The District relies on the revenue stream from the leases to fund school programs, and other challenging factors include contract arrangements, displacement issues, and scheduling involving outside entities. Displaced private school students would need to be relocated, which could require improvements elsewhere. The currently leased District properties would also require improvements to meet the interim housing demands and would need to find other tenants once the modernizations are completed. For these reasons, terminating four lease contracts as an alternative was considered but rejected.

A centralized location alternative was also considered but rejected. Under this alternative, the interim housing for modernizations would be at more centralized locations, such as the District office at 17200 Pinehurst Lane and the Park View School at 16666 Tunstall Lane, both in Huntington Beach. However, these District-owned sites are not currently used for student housing; therefore, the buildings would require extensive improvements to meet CDE standards. Park View School was closed more than 30 years ago and would require various modernizations, upgrades, and remediation of asbestos-containing materials to provide student housing. Modernization of these sites would likely result in greater environmental impacts, and modernizing these sites for temporary housing would not be the most efficient and economic use of available funds. Therefore, this alternative was rejected.

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### 7.3 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Based on the criteria listed above, two 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 Project, but which may avoid or substantially lessen the significant effects of the Project. These alternatives are analyzed in detail in the following sections.

- No Project/No Modernization Alternative
- Modernization and Interim Housing On-Site Alternative

Per CEQA Guidelines Section 15126.6(d), additional significant effects of the alternatives are discussed in less detail than the significant effects of the Project as proposed.

An EIR must identify an “environmentally superior” alternative, and where the No Project Alternative is identified as environmentally superior, the EIR is required to identify as environmentally superior an alternative from among the others evaluated. Each alternative’s environmental impacts are compared to the Proposed Project and determined to be environmentally superior, neutral, or inferior. However, only impacts found significant and unavoidable are used to make the final determination of whether an alternative is environmentally superior or inferior to the Proposed Project. No environmental impacts were found to be significant and unavoidable for the Proposed Project. Since all impacts were found to be less than significant, the alternatives were simply judged on their ability to reduce impacts further. Section 7.7 identifies the Environmentally Superior Alternative.

The Proposed Project, which is the preferred land use alternative, is analyzed in detail in Chapter 5 of this DEIR.

### 7.4 NO PROJECT/NO MODERNIZATION ALTERNATIVE

Under this alternative, no modernizations would occur on 11 of the existing campuses, and no interim housing would be necessary. All 13 schools would continue to operate without the proposed student safety improvements, such as camera systems and security fencing, emergency systems, and fire-life items; plumbing and other infrastructure improvements; improved educational technology; and improved play areas. Instead, minor fixes and repairs would be performed as problems are identified. Under this alternative, no portable buildings would be constructed to temporarily house students.

#### 7.4.1 Air Quality

Under this alternative, no constructions would occur. Therefore, air quality impacts related to grading and portable classroom construction would be eliminated, and no mitigation measures would be necessary. No changes in traffic patterns would result under this alternative, and no operational air quality impact would occur. Air quality impacts of this alternative would be less than the Proposed Project.

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### 7.4.2 Cultural Resources

Under this alternative, no ground disturbance would occur; therefore, no previously unidentified cultural resources would be impacted, including archaeological and tribal cultural resources. This alternative would eliminate the need for mitigation measures. Under this alternative, cultural impacts would be less than the Proposed Project.

### 7.4.3 Greenhouse Gas Emissions

The Proposed Project would result in a net decrease in greenhouse gas (GHG) emissions of approximately 2,239 metric tons of CO<sub>2e</sub> (MTCO<sub>2e</sub>) per year. Under this alternative, no construction-related or mobile-source emissions would be generated. GHG impacts of this alternative would be less than the Proposed Project.

### 7.4.4 Hydrology and Water Quality

Under this alternative, no potentially significant impacts from disturbance of soils and increased impervious surface would occur. The modernization and interim housing schools are already developed, and runoff is conveyed by surface streets or local storm drains to regional storm drainage facilities. This alternative would also eliminate the need for mitigation measures because there would be no changes to existing conditions. Hydrology and water quality impacts under this alternative would be less than the Proposed Project.

### 7.4.5 Noise

Under this alternative, no construction would occur; therefore, the short-term construction noise and vibration impact would be eliminated. The existing operation would continue, and no additional trips or increase in VMT would occur. Therefore, no increase in transportation noise is anticipated under this alternative. Noise impacts of this alternative would be less than the Proposed Project.

### 7.4.6 Transportation and Traffic

Under this alternative, no additional Project-related trips would be generated, and no signalized intersections would operate at unacceptable level of service (LOS). This alternative would eliminate the need for mitigation. Transportation and traffic impacts of this alternative would be less than the Proposed Project.

### 7.4.7 Conclusion

This alternative would lessen environmental impacts in all environmental areas evaluated in the EIR (i.e., air quality, cultural resources, GHG emissions, hydrology and water quality, construction and operational noise, and traffic). However, this alternative would not meet any of the Project objectives. No significant and unavoidable impact has been identified for the Proposed Project, and this alternative is considered environmentally superior to the Proposed Project.

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### 7.5 MODERNIZATION AND INTERIM HOUSING ON-SITE ALTERNATIVE

Under this alternative, the modernization of 11 campuses would take place, but students would not be relocated to the off-site interim housing schools during construction. Instead, necessary interim housing facilities would be provided on each of the campuses to allow for modernizations. (Harbour View ES would not need interim housing for the Proposed Project or for this alternative.) Students would continue to attend their home schools, and no additional vehicle trips would be generated. Without the increased trips, impacts to air quality, GHG emissions, and noise related to mobile sources would be eliminated. Traffic intersection impacts would also be eliminated under this alternative. Each campus would need to provide its own portable classrooms, walkways, and other necessary infrastructure during modernization. Therefore, there would be 11 construction sites with various construction-related impacts, such as more ground disturbances, longer construction period, and more portable classrooms installed and removed.

#### 7.5.1 Air Quality

Under this alternative, portable classrooms would be developed on each of the modernization campuses. Therefore, instead of construction on two campuses under the Proposed Project, ten campuses would be disturbed for construction and to install portable classrooms. The Proposed Project would result in exceedance of localized significance thresholds (LSTs) during construction. Therefore, additional construction sites would result in increased construction air quality impact. A longer construction period would also be necessary, since portable classrooms would need to be placed on ten campuses compared to two campuses. Therefore, short-term construction air quality impact would be greater than the Proposed Project. The majority of operational air quality impact comes from mobile sources, and because no changes in traffic pattern would result from this alternative, operational air quality would likely be similar to existing conditions. This alternative would result in less environmental impact than the Proposed Project operationally.

#### 7.5.2 Cultural Resources

Under this alternative, portable classrooms for interim housing would be installed at 10 of the modernization campuses. (No interim housing was deemed necessary at Harbour View ES.) Therefore, soil excavation and utility trenching would be necessary at these schools, and the potential for discovering previously unidentified archaeological resources would increase under this alternative. This alternative would result in greater impacts to cultural resources compared to the Proposed Project.

#### 7.5.3 Greenhouse Gas Emissions

Under this alternative, the average daily vehicle miles traveled (VMT) would not increase because the students from modernization campuses would continue to attend the same schools. The greatest GHG emissions are generated by mobile sources. Therefore, it is anticipated that the GHG emissions under this alternative would be substantially less than the Proposed Project, even when considering the reduction in GHG emissions due to busing. This alternative would result in less environmental impacts related to GHG emissions than the Proposed Project.

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### 7.5.4 Hydrology and Water Quality

This alternative would require installation of portable classrooms at ten modernization schools compared to two interim housing schools under the Proposed Project. Therefore, the area to be prepared and disturbed for portable classrooms and utilities would be greater than for the Proposed Project. As with the Proposed Project, compliance with the NPDES Construction General Permit and implementation of appropriate best management practices would be required if the area of disturbance is more than one acre. And if additional impervious surface exceeds 5,000 square feet, a mitigation measure would be required to ensure that post-project runoff volumes are not more than existing conditions. Interim housing provision at ten schools instead of two could expand the potential impacts to the Westminster Channel (C04) and Sunset Channel (07) well as the East Garden Grove-Winstersburg Channel (05). As with the Proposed Project, no further water quality impacts are anticipated once the modernizations are completed. This alternative would result in greater impacts than the Proposed Project for hydrology and water quality during construction and similar impacts during operation.

### 7.5.5 Noise

Under this alternative, the number of construction sites would increase, exposing more sensitive receptors to construction-related noise for a longer period. Instead of ground disturbance and increased impervious surfaces at two interim housing campuses (Sun View ES and Pleasant View/OVPP) and two modernization campuses (Westmont ES and College View ES), ten modernization campuses would require portable classrooms and supporting infrastructure construction in addition to the proposed modernization. This alternative would result in greater construction-related noise and vibration impacts. No increase in Project-related trips and VMT would occur under this alternative; therefore, no mobile source-related operational noise impact is anticipated. Construction noise impacts under this alternative would be greater than the Proposed Project and operational noise impacts would be less than the Proposed Project.

### 7.5.6 Transportation and Traffic

Under this alternative, only Project-related construction trips would be generated because students would continue to attend their home schools. No signalized or unsignalized intersections would operate at unacceptable level, since the traffic conditions would be similar to the Without Project conditions. No mitigation requiring a busing program would be necessary. However, this alternative could result in greater queuing impacts or other internal circulation hazards due to various construction-related activities, and these could result in lane closures or restricted access. Nevertheless, this alternative would eliminate potentially significant intersection impacts and therefore would lessen environmental impacts related to traffic compared to the Proposed Project.

### 7.5.7 Conclusion

This alternative would lessen environmental impacts in the areas of operational air quality, GHG emissions, operational noise, and traffic and transportation; it would worsen impacts in the areas of construction air quality, cultural resources, hydrology and water quality, and construction noise. This alternative would

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generally reduce the Project-related trips and VMT but increase impacts related to construction. One of the Project objectives is to complete all construction in the most efficient and economical manner possible in order to maximize return on investment. However, more portables would be installed and removed, and more ground would be disturbed, which would delay the schedule, increase construction costs, and not use available funds in the most efficient and economic manner. Another Project objective is also to complete all construction with the least amount of disruption or inconvenience to the educational process. If students must remain on campus, construction could cause disruption and inconvenience during instructional hours. This alternative is considered environmentally superior to the Proposed Project but would not be consistent with all the Project objectives. No significant and unavoidable impact has been identified for the Proposed Project.

### 7.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

As required by CEQA Guidelines Section 15126.6, an EIR must identify an “environmentally superior alternative,” which would be the alternative that has the least impact on the environment or would be capable of avoiding or substantially lessening any significant impacts of the Project. In cases where the “No Project” Alternative is the environmentally superior alternative, an environmentally superior development alternative must be identified. The Proposed Project would not result in any significant and unavoidable impact. As summarized in Table 7-1, the No Project/No Development Alternative and the Modernization and Interim Housing On-Site Alternative would both have less environmental impact than the Proposed Project. The No Project/No Development Alternative would lessen impacts in all environmental topics evaluated, and the Modernization and Interim Housing On-Site Alternative would lessen impacts in five topic areas and increase impacts in three. Table 7-2 shows how well each alternative meets the objectives of the Project. The No Project/No Development Alternative would not meet any of the objectives, and the Modernization and Interim Housing On-Site Alternative would meet some of the objectives. The Modernization and Interim Housing On-Site Alternative has been identified as the environmentally superior alternative.

**Table 7-1 Comparison of Alternatives to the Proposed Project**

<b>Environmental Topic</b>	<b>Proposed Project</b>	<b>Alternative 1 No Project/ No Development Alternative</b>	<b>Alternative 2 Modernization and Interim Housing On-site Alternative</b>
Air Quality (Construction)	Less Than Significant/MM	Less	Greater
Air Quality (Operation)		Less	Less
Cultural Resources	Less Than Significant/MM	Less	Less
GHG Emissions	Less Than Significant	Less	Less
Hydrology and Water Quality	Less Than Significant/MM	Less	Greater
Noise (Construction)	Less Than Significant	Less	Greater
Noise (Operation)			Less
Transportation and Traffic	Less Than Significant/MM	Less	Less

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**Table 7-2 Ability of Each Alternative to Meet the Project Objectives**

Objective	Proposed Project	No Project / No Development Alternative	Modernization and Interim Housing On-Site Alternative
Improving student safety and campus security systems, including security fencing, security cameras, emergency communications systems, smoke detectors, fire alarms, and sprinklers.	YES	NO	YES
Repairing or replacing deteriorating roofs, plumbing, heating, ventilation, and electrical systems.	YES	NO	YES
Providing the equipment and educational technology needed to support high-quality instruction in science, reading, music, arts, and math.	YES	NO	YES
Improving access to school facilities for students with disabilities.	YES	NO	YES
Ensuring that children's play areas meet current health and safety standards.	YES	NO	YES
Provide interim school housing in order to provide a safe, consistent environment for student learning while school buildings are being modernized.	YES	NO	YES
Complete all construction in the safest possible manner.	YES	NO	Partially
Complete all construction with the least amount of disruption or inconvenience to the educational process.	YES	NO	NO
Complete all construction in the most efficient and economical manner possible in order to maximize return on investment.	YES	NO	NO
Maximize control of the construction process by minimizing the potential for problems and enabling more solutions should problems materialize.	YES	NO	NO
Complete all work as quickly as possible.	YES	NO	NO

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