

# 7. Alternatives to the SUP

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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.”<sup>1</sup> This chapter identifies potential alternatives to the proposed project and evaluates them, as required by CEQA.

Key provisions of the CEQA Guidelines on alternatives are summarized below to explain the foundation and legal requirements for the alternatives analysis in the EIR.<sup>2</sup>

- “The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.”<sup>3</sup>
- “The specific alternative of ‘no project’ shall also be evaluated along with its impact.”<sup>4</sup>
- “The no project analysis shall discuss the existing conditions at the time the Notice of Preparation (NOP) is published, and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.”<sup>5</sup>
- “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.”<sup>6</sup>
- “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

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<sup>1</sup> CEQA Guidelines Section 15126.6

<sup>2</sup> CEQA Guidelines Sections 15126.6(a) through (f)

<sup>3</sup> CEQA Guidelines Section 15126.6(b)

<sup>4</sup> CEQA Guidelines Section 15126.6(e)(1)

<sup>5</sup> CEQA Guidelines Section 15126.6(e)(2)

<sup>6</sup> CEQA Guidelines Section 15126.6(f)

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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).”<sup>7</sup>

- “For alternative locations, “only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.”<sup>8</sup>
- “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.”<sup>9</sup>

For each development alternative, this analysis:

- Describes the alternative
- Analyzes the impact of the alternative 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

Per the 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.

### 7.1.2 Typical SUP Project Categories

The environmental analysis in this document is based on the following typical SUP project categories.

- Type 1. New Construction on New Property (adjacent to existing campus)
- Type 2. New Construction on Existing Campus
- Type 3. Modernization, Repair, Replacement, Upgrade, Remodel, and Renovation
- Type 4. Operational and Other Campus Changes

### 7.1.3 Project Objectives

The following objectives have been established for the SUP and will aid decision makers in their review of the project and associated environmental impacts:

- Repair aging schools and improve student safety.
- Upgrade schools to modern technology and educational needs.

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<sup>7</sup> CEQA Guidelines Section 15126.6(f)(1)

<sup>8</sup> CEQA Guidelines Section 15126.6(f)(2)(A)

<sup>9</sup> CEQA Guidelines Section 15126.6(f)(3)

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- Create capacity to attract, retain, and graduate more students through a comprehensive portfolio of small, high quality Pre-K through adult schools.
- Promote healthier environment through green technology.

### 7.2 POTENTIALLY SIGNIFICANT IMPACTS OF THE SUP

A primary consideration in defining SUP alternatives is their potential to reduce or eliminate significant impacts and to meet most of the objectives. The impact analysis in Chapter 5 of this EIR concludes that the following impacts would be potentially significant and unavoidable even after implementation of regulatory requirements and LASUD Standards and consideration of feasible mitigation measures.

#### 7.2.1 Air Quality

**Impact 5.3-2: Regional Construction Emissions.** Construction activities may generate short-term emissions that exceed of the South Coast Air Quality Management District's regional significance thresholds and cumulatively contribute to the South Coast Air Basin nonattainment designations.

**Impact 5.3-4: Local Construction Emissions.** Site-specific projects may generate short-term emissions that exceed South Coast Air Quality Management District's localized significance thresholds and expose sensitive receptors to substantial pollutant concentrations.

#### 7.2.2 Cultural Resources

**Impact 5.5-1: Historical Resources.** SUP-related project implementation may substantially degrade the significance of historical resources.

#### 7.2.3 Noise

**Impact 5.12-1: Local Noise Ordinance.** SUP implementation may result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance.

**Impact 5.12-2: Construction Vibration.** SUP-related project construction activities may result in generation of excessive groundborne vibration.

**Impact 5.12-4: Construction Noise.** Construction activities may result in substantial temporary or periodic increase in ambient noise levels in the project vicinity.

#### 7.2.4 Transportation and Traffic

**Impact 5.16-1: Traffic.** SUP-related trip generation may have the potential to impact levels of service on the existing area roadway system.

**Impact 5.16-2: Traffic.** SUP-related trip generation may result in designated road and/or highways exceeding county congestion management agency standards.

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### 7.3 ALTERNATIVES CONSIDERED AND REJECTED DURING THE 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 Program EIR (EIR).

#### 7.3.1 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.<sup>10</sup> The project is the SUP for the entire LAUSD. The project is intended to provide improvements, repairs, and maintenance to existing LAUSD schools and future school expansions and to benefit current and future students in the District. Therefore, the SUP could not be implemented outside of the District's boundaries, and no alternative development area can feasibly be considered.

### 7.4 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Based on the criteria listed above, the following two options were determined to represent a reasonable range of alternatives, have the potential to feasibly attain most of the basic SUP objectives, and may substantially lessen the four potentially significant effects of the SUP.

- No Project Alternative
- Reduced SUP Alternative

An EIR must identify an “environmentally superior” alternative, and where that is the No Project Alternative, the EIR must identify another alternative as environmentally superior. Each alternative's environmental impacts are compared to the proposed SUP and determined to be environmentally superior, neutral, or inferior.

Because of the type of program-level alternatives identified for the SUP (both would significantly reduce all impacts), the following environmental topics found to be less than significant for the proposed SUP would be less than significant for each of the alternatives:

- Aesthetics
- Agriculture and Forestry Resources
- Biological Resources
- Geology and Soils

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<sup>10</sup> CEQA Guidelines Section 15126(5)(B)(1).

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- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Pedestrian Safety
- Population and Housing
- Public Services
- Recreation
- Utilities and Service Systems

Only those impacts found significant (air quality, cultural resources, noise, and traffic) are used in this alternatives analysis, and only those found significant and unavoidable are used to make the final determination for the superior alternative (for this project same as significant impacts). Section 7.7 identifies the Environmentally Superior Alternative.

### 7.4.1 No Project Alternative

The No Project Alternative would only involve maintenance and critical repairs required for health and safety, including repair and maintenance of construction, protection, and occupancy features necessary to minimize danger to life and maintain full compliance with current codes and regulations.

This alternative would not involve property acquisition or construction or installation of any buildings. Existing buildings and school campuses would continue to deteriorate (most noticeably cosmetically as nonessential maintenance and repairs are deferred). The No Project Alternative would include, but not be limited to, the following types of minor essential projects:

- Heating, ventilation, and air conditioning (HVAC) repairs needed to maintain classroom temperatures conducive to learning.
- Repair of broken, unsafe walkways and driveways.
- Seismic retrofits.
- Maintenance of fire alarm and fire suppression systems.
- Replacement of poor lighting.
- Repairs to security systems and emergency communications systems.
- Abatement of asbestos and lead-based paint.

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- Replacement of lead pipes.
- Improvements for Americans with Disabilities Act (ADA) compliance: ramps, rails, etc.
- Replacement fencing.
- Essential replacement of building systems such as flooring, windows, and roofing.
- Essential repair of modular units or portable classrooms.
- Relocation of portables on campus to avoid a safety hazard.

### 7.4.2 Air Quality

This alternative would not involve construction projects that would generate significant air emissions. Most minor projects would not involve heavy construction equipment. The total number of projects that the District would undertake would be significantly reduced in this alternative compared to the proposed SUP. Overall, total emissions would be substantially reduced by this alternative. This alternative would be superior to the SUP.

### 7.4.3 Cultural Resources

This alternative would not involve demolition or substantial alterations to existing historic buildings except for critical repairs needed for health and safety. However, because these buildings are already some of the oldest in the District, they would deteriorate and may lose some essential defining features. These features could be repaired later when a safety issue arises. Because physical damage and demolition cause the greatest impacts to historic districts and buildings, under this alternative impacts to historical resources would be greatly reduced. This alternative would not involve grading or excavation for construction projects, and would not involve construction on new properties; therefore, any surrounding historic buildings would not be affected. This alternative would be superior to the SUP.

### 7.4.4 Noise

Under the No Project Alternative the types of projects that would be completed would not involve large construction equipment that would generate significant noise. Standards established in the local general plan or noise ordinance would not be exceeded. Additionally, without the construction equipment, projects would not generate excessive groundborne vibration or significantly increase ambient noise levels. This alternative would be superior to the SUP.

### 7.4.5 Transportation and Traffic

This alternative would not construct new classrooms, stadiums, or community use buildings, and would not install field lights. Any project that increases trip generation at an existing school would not be included in

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this alternative. Therefore, the potential to impact levels of service on the existing area roadway system would not occur. This alternative would be superior to the SUP.

### 7.4.6 Conclusion

Overall, this alternative would reduce environmental impacts in comparison to the proposed project. The No Project alternative would not meet most of the objectives of the SUP.

- Repair aging schools and improve student safety. This alternative would improve safety but only where there was a critical need for repairs.
- Upgrade schools to modern technology and educational needs. This alternative would not meet this objective because modern technology is not critical to health and safety.
- Create capacity to attract, retain and graduate more students through a comprehensive portfolio of small, high quality Pre-K through adult schools. This alternative would not meet this objective because new seats would not be constructed.
- Promote healthier environment through green technology. This alternative would not meet this objective because, although desired, green technology is not critical to health and safety.

## 7.5 REDUCED SUP ALTERNATIVE

This alternative would not include installation of more than 9 modular or portable classroom buildings, acquisition of any property, or the construction of any permanent buildings. All projects under this alternative would qualify for one or more of the CEQA statutory or categorical exemptions, as listed in Chapter 4, *Project Description*.

- Installation of modular units, portable classrooms, or bungalows resulting in a net increase student capacity *less than* 25 percent or 10 classrooms, whichever is greater.
- Sustainability energy conservation installations, such as new photovoltaic panels on rooftops and parking-lot shade structures or small wind arrays.
- Essential and cosmetic replacement of building systems such as flooring, windows, and roofing.
- New or replacement furniture or other interior equipment.
- Replace existing diesel buses with higher efficiency buses.
- Sustainability energy conservation changes, such as replacement, upgrade, or retrofit of inefficient lighting, electrical transformers, or building insulation, and installation of irrigation smart controllers.

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- Essential and cosmetic upgrades of modular units or portable classrooms, relocation of portables on campus.
- Exterior cosmetic improvements such as Facelift Program, painting, site cleanup.
- Essential and nonessential interior remodeling and renovations; painting; installation, repair, and upgrades to fire/life-safety/security/emergency systems; ADA; plumbing, lighting, electrical, HVAC, and computer systems; low-flow restroom fixtures; and food service equipment.
- Change in student capacity (student classroom loading but not an increase in school seating).
- Closure of existing school or transfer of students to another school (as long as the increase at the new school does not generate a significant environmental impact).

### 7.5.1 Air Quality

To qualify for a CEQA exemption, this alternative would not involve construction projects that would generate significant air emissions. These projects would not involve more than two or three pieces of heavy construction equipment. The total number of projects that the District would undertake would be significantly reduced in this alternative. Overall, total emissions would be substantially reduced by this alternative. This alternative would be superior to the SUP.

### 7.5.2 Cultural Resources

This alternative would not involve demolition of existing historic buildings. Repairs and improvements would occur but could not involve permanent damage to historic features (in-kind replacement would be permitted). Because physical damage and demolition is the greatest impact to historic districts and buildings, impacts to historical resources would be greatly reduced under this alternative. This alternative would not involve grading or excavation for construction projects and would not involve construction on new properties; therefore, any surrounding historic buildings would not be affected. This alternative would be superior to the SUP.

### 7.5.3 Noise

Under the Reduced SUP Alternative, the types of projects that would be completed would not involve large construction equipment operating adjacent to older, fragile buildings or to noise- and vibration-sensitive land uses. Standards established in the local general plan or noise ordinance would not be exceeded. Projects would involve fewer pieces of construction equipment and would not exceed local noise ordinances. This alternative would be superior to the SUP.

### 7.5.4 Transportation and Traffic

This alternative would not construct stadiums or community use buildings and would not install field lights. Any project that significantly increases trip generation at an existing school would not be included in this



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alternative. Therefore, there would be no potential to impact levels of service on the existing area roadway system. This alternative would be superior to the SUP.

### 7.5.5 Conclusion

Overall, the Reduced SUP alternative would reduce environmental impacts in comparison to the proposed project. This alternative would not meet some of the objectives of the SUP.

- Repair aging schools and improve student safety. This alternative would meet this objective.
- Upgrade schools to modern technology and educational needs. This alternative is anticipated to meet this objective, but it depends on the scope of the upgrade.
- Create capacity to attract, retain and graduate more students through a comprehensive portfolio of small, high quality Pre-K through adult schools. This alternative would partially meet this objective because of the limit on the number of seats that could be provided at each school to qualify for the CEQA exemption.
- Promote healthier environment through green technology. This alternative is anticipated to meet this objective, but it depends on the scope of the upgrade.

## 7.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the “environmentally superior alternative” and, in cases where the “No Project” Alternative is environmentally superior to the proposed project, the environmentally superior development alternative must be identified. The Reduced SUP Alternative has been identified as “environmentally superior” to the proposed project. This alternative would reduce impacts associated with the SUP by limiting the scope and type of projects that would be undertaken.

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