

7. Alternatives to the Proposed Project

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 Section 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]).
- “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])

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- “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 3.3, 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.

1. Provide a local school to serve the Eastside Neighborhood.
2. Reduce operational costs associated with transporting students to widely dispersed school sites.
3. Provide safe vehicular and pedestrian school access by avoiding direct access via 14th Street, a major arterial.

7.2 POTENTIALLY SIGNIFICANT IMPACTS OF THE PROJECT

A primary consideration in defining project alternatives is their potential to reduce or eliminate significant impacts and to meet most of the objectives. Pursuant to CEQA Guidelines Section 15126.6[b], alternatives to the proposed project include those that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede attainment of the project objectives to some degree or would be more costly.

In accordance with the thresholds of significance required by CEQA, the proposed project was found to result in significant impacts related to the following two impacts:

Cultural Resources

- **Impact 5.2-1:** Development of the proposed project could cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.

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Noise

- **Impact 5.2-2:** Project-related long-term operational traffic noise would exceed established thresholds.

Therefore, this chapter considers alternatives to avoid or lessen these two significant and unavoidable impacts of the proposed project.

7.3 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.

7.3.1 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 are 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 Section 15126.6[f][2][A]).

The District considered a few alternative school sites but rejected for various reasons. A 7-acre site along Commerce Street between 4th Street and Mission Inn Avenue was considered but was rejected because the site and the surrounding area consist largely of Old Riverside Recycling and Union Pacific land, where much of the area is subject to extensive site cleanup under the oversight of Department of Toxic Substances Control. A 4.9-acre site on Linden Street near Dwight Street was considered. This site was rejected due to its small size and limited street access, where it would be accessible only through one neighborhood street. Furthermore, Longfellow Elementary School is only three blocks from this site, and having two elementary schools so close to each other would not have been the best option for the Eastside Neighborhood. A 1.5-acre site on the east side of Forest Street between Cottage Street and Pleasant Street was considered but rejected due to its small size. An approximately 18-acre commercial property at the southwest corner of University Avenue and Chicago Avenue was reviewed but this site was rejected due to safety reasons. Because the site borders two heavily traveled arterial roadways, it was determined that safe access would be an issue, and reusing the existing commercial buildings for elementary school use would have been infeasible due to various regulations related to school construction.

As demonstrated by the above-discussed sites that were considered but rejected, there is no available land larger than seven acres (minimum site design option under Option 2) that could be developed as an elementary school without involving a street vacation within the Eastside Neighborhood. Therefore, as with the proposed project, an alternative development area within the Eastside Neighborhood would likely require street vacation(s) to consolidate smaller parcels into a sizeable development site. Several of the properties within the project site

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have been previously evaluated for historic significance and determined as not historically significant. However, upon re-evaluation, the 4343 Park Avenue property (Wiley-Williams House) was determined to have historic significance. Therefore, without a site-specific analysis and evaluation, impacts on historic resources would be unknown, and the lessening of environmental impacts related to historic resources impact cannot be evaluated.

Because the main reason for significant and unavoidable operational noise impact is the redistribution of traffic due to street vacation and the low traffic volumes in residential streets, it is anticipated that the development of an elementary school with the same size and programming within the Eastside Neighborhood could also result in similar noise impacts as the proposed project. Therefore, in general, any development of the similar size and type proposed by the project in the Eastside Neighborhood would have substantially the same impacts on air quality, greenhouse gas emissions, noise, recreation, transportation, and tribal cultural resources as analyzed under the proposed project. Without a site-specific analysis, impacts on cultural resources and hazards and hazardous materials cannot be evaluated. Therefore, no alternative development area within the Eastside Neighborhood would reasonably avoid or substantially lessen any of the significant effects of the proposed project, and this alternative was rejected for further consideration.

7.3.2 Retaining Park Avenue

Pursuant to the CEQA Guidelines Section 15126.6[f], the range of alternatives is governed by a ‘rule of reason’ and an EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. One alternative that would reduce significant noise impact would be not to vacate Park Avenue, which would result in two separate campuses, one on the east side of Park Avenue as the main campus with classroom buildings and one on the west side of Park Avenue with athletic facilities and hardcourts. This would require students to cross a public right-of-way during school hours. This option of keeping Park Avenue was considered by the District and discussed with the City of Riverside during the discussion related to the City’s Affordable Housing & Sustainable Communities (AHSC) + Transformative Climate Communities (TCC) program, where the City’s plan included a bike path going through Park Avenue from 14th Street to University Avenue. However, because of student safety concerns, this design would not meet the requirements of the Division of the State Architect (DSA), therefore, would not be approved by them. An option of providing a bridge connection between the two sides was also considered but considering the already small size of the project site and economic viability of building a safe bridge that meets DSA requirements, this option was also rejected for further analysis. The site suitability and economic viability are among the factors that may be taken into account when addressing the feasibility of alternatives (CEQA Guidelines Section 15126.6[f][1]).

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7.4 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Based on the criteria listed above, the following three alternatives have been determined to represent a reasonable range of alternatives which have the potential to feasibly attain most of the basic objectives of the project, but which may avoid or substantially lessen any of the significant effects of the project. These alternatives are analyzed in detail in the following sections.

- No Project Alternative
- Integrated Historic Resources Alternative
- Alternate Design 14th Street Project Access Alternative

An EIR must identify an “environmentally superior” alternative, and where the No Project Alternative is identified as environmentally superior, the EIR is then 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. Section 7.8 identifies the Environmentally Superior Alternative. The preferred land use alternative (proposed project) is analyzed in detail in Chapter 5 of this Draft EIR.

7.5 NO PROJECT ALTERNATIVE

CEQA Guidelines require the analysis of a no project alternative. This analysis must discuss the existing site conditions as well as what would be reasonably expected in the foreseeable future based on any current plans if the project were not approved. As summarized in Table 4-1, *Project Site Parcels*, the project site is developed with an existing high school, a public park, residential units, three commercial and industrial properties, nine vacant residential parcels, a telecommunication facility, two alleyways, and two street rights of way. Under the No Project Alternative, the project site would not be developed, and the existing uses onsite would remain. Therefore, no demolition or construction would occur under this alternative. The majority of students from the Eastside Neighborhood would continue to be transported to elementary schools outside of the neighborhood.

7.5.1 Air Quality

This alternative would not generate construction-related air quality impacts. It would not result in short-term emissions in exceedance of South Coast Air Quality Management District's (South Coast AQMD) threshold criteria and would not result in construction health risk impacts. Therefore, no construction-related mitigation measures would be incorporated. The long-term operational air quality impacts would also be eliminated as there would be no increase in criteria air pollutant emissions from area sources (e.g., landscaping equipment, architectural coating) and energy (i.e., natural gas used for heating). No mitigation measure for operational impact has been identified under the proposed project. Air quality is not a significant and unavoidable impact of the proposed project.

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7.5.2 Cultural Resources

This alternative would not involve the demolition of existing structures or the disturbance of on-site soils. Therefore, there would be no impacts to existing historic resources and archaeological resources, and no mitigation measures are required. This alternative would eliminate significant and unavoidable impacts to historic resources, therefore would have less environmental impacts related to cultural resources compared to the proposed project. Cultural impact is a significant and unavoidable impact of the proposed project.

7.5.3 Greenhouse Gas Emissions

This alternative would not generate construction-related GHG emissions nor any new operational-related GHG emissions. Under this alternative, the net increase of 764 metric tons of carbon dioxide equivalent (MTCO_{2e}) per year from the proposed project would be eliminated. Therefore, this alternative would have less GHG emissions impact compared to the proposed project. GHG is not a significant and unavoidable impact of the proposed project.

7.5.4 Hazards and Hazardous Materials

Under this alternative, there would be no use, handling, or disposal of construction-related hazardous materials. However, the existing hazardous materials on-site from past uses would not be remediated. This alternative would not require remediation under the oversight of the Department of Toxic Substances Control (DTSC) as a mitigation measure. This alternative would reduce hazardous materials impacts related to construction since there would be no construction. The existing land uses include an auto shop and light industrial use, which would continue to use, handle, and dispose of hazardous materials compared to the proposed operation of an elementary school that would use small quantities of hazardous materials associated with janitorial, maintenance, and repair activities. Therefore, it is anticipated that greater operational impacts would occur under the No Project Alternative compared to the proposed project. Hazards and hazardous materials impact is not a significant and unavoidable impact of the proposed project.

7.5.5 Noise

This alternative would not generate construction noise nor any new operational noise, since the project site would not be developed. This alternative would have less construction and operational impacts compared to the proposed project. Operational noise is a significant and unavoidable impact of the proposed project.

7.5.6 Recreation

Under this alternative, no impacts to the existing recreation facilities, including Lincoln Park and Lincoln High School would occur. Under Options 1 and 3, the proposed project would demolish the existing Lincoln High School and associated grass playfields and hardcourts but replacement turf fields and hardcourts would be provided. Turf playfields and hardcourts on the existing high school and the proposed elementary school would both be available for community use pursuant to the Civic Center Act. No impacts to Lincoln Park would occur under Options 1 and 3. Furthermore, an elementary school is not a growth-inducing land use that increases demand for recreational facilities. Therefore, the No Project Alternative would have similar impacts related to

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recreation facilities compared to Options 1 and 3. Option 2 of the proposed project would impact 0.78 acres of the existing Lincoln Park and restrict access to the 0.78-acre space during school operating hours. However, Option 2 also creates joint-use opportunities for additional 2.48 acres of greenspace and hardcourts areas during non-school hours as discussed in the Draft EIR Section 5.6, *Recreation*. Therefore, implementation of Option 2 could be considered a beneficial impact to the community. While beneficial operational impact related to recreation facilities is anticipated under Option 2, the proposed project would have an adverse construction impact since the 0.78-acre of Lincoln Park cannot be used during construction. Therefore, impacts related to the No Project Alternative would be less than the proposed project under Option 2. Recreation impact is not a significant and unavoidable impact of the proposed project.

7.5.7 Transportation

This alternative would not generate any construction-related traffic nor any operational traffic, including changes to traffic patterns due to the vacation of Park Avenue under all three options plus 13th Street under Option 2. Therefore, no impacts to program, plan, or policy addressing the circulation system would occur. No impacts on the existing vehicle miles traveled (VMT) would occur, and students from the Eastside Neighborhood would continue to be transported to five different schools outside of the neighborhood. This alternative would reduce impacts related to transportation compared to the proposed project. Transportation is not a significant and unavoidable impact of the proposed project.

7.5.8 Tribal Cultural Resources

This alternative would not require any ground-disturbing activities. Therefore, this alternative would not result in any impacts related to tribal cultural resources, and no mitigation would be necessary. This alternative eliminates any tribal cultural resources impacts identified under the proposed project. However, tribal cultural resources is not a significant and unavoidable impact of the proposed project.

7.5.9 Conclusion

The No Project Alternative would lessen the proposed project's environmental impacts in all areas except for hazards and hazardous materials impact, where it would have a greater impact. This alternative would eliminate significant and unavoidable cultural resources and operational noise impacts. However, the proposed project would not meet any of the project objectives in Section 7.1.2, as described below.

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Project Objectives	Ability to Meet Project Objectives	Explanation
1. Provide a local school to serve the Eastside Neighborhood.	No	No elementary school would be developed under this alternative, therefore, this project objective would not be met.
2. Reduce operational costs associated with transporting students to widely dispersed school sites.	No	No elementary school would be developed under this alternative, therefore, students would continue to be widely dispersed to other school sites and this project objective would not be met.
3. Provide safe vehicular and pedestrian school access by avoiding direct access via 14th Street, a major arterial.	No	No elementary school would be developed under this alternative, therefore, this project objective would not be met.

7.6 INTEGRATED HISTORIC RESOURCES ALTERNATIVE

Under this alternative, the historic residence at 4343 Park Avenue (Wiley-Williams House) totaling 1,015 square feet would be relocated to a new location within the project site and rehabilitated in accordance with the Secretary of the Interior’s Standards (SOIS). Therefore, all three historic resources, the 4343 Park Avenue property, and the two historic properties on Lincoln High School (Irving Elementary School Kindergarten Building and Irving Elementary School Assembly Building) would remain in the Eastside Neighborhood and would not be demolished. The historic buildings would be rehabilitated to meet District’s needs while retaining their historic integrity and significance. This alternative would reduce the programmable space for the Eastside students in an already small school site. Therefore, impacts on historic resources would be reduced to a less than significant level. Historic resources impact is a significant and unavoidable impact of the proposed project.

7.6.1 Air Quality

This alternative would have similar construction air quality impacts as the proposed project because the area of disturbance and total building square footages would be similar to the proposed project. Although this alternative would slightly reduce the total demolition square footage by 1,015 square feet, this would be a negligible change to result in any reduction in construction air quality impact. During the operational phase, this alternative would result in similar vehicle trips and VMT impacts compared to the proposed project, because it would not change the project location or reduce the buildout enrollment capacity. This alternative would have similar construction phase and operational air quality impacts compared to the proposed project. The same construction mitigation measures would be necessary. Air quality is not a significant and unavoidable impact of the proposed project.

7.6.2 Cultural Resources

This alternative would retain and rehabilitate all three historic resources within the project boundary. As with the proposed project, the existing Irving Elementary School Kindergarten Building and Irving Elementary School Assembly Building would remain in the same location and be rehabilitated as dictated by their historic uses. The Wiley-Williams House would need to be relocated to a new location in Lincoln High School, possibly near the other two historic buildings since its location would interfere with the design of the elementary school. Therefore, this alternative would reduce impacts to historic resources to a less than significant level. The area

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to be disturbed would remain the same, therefore, impacts to archaeological resources would be similar to the proposed project. Cultural resources is a significant and unavoidable impact of the proposed project, and this alternative would eliminate this significant impact.

7.6.3 Greenhouse Gas Emissions

This alternative would not reduce GHG emissions during construction because it would disturb the same surface area and build the same square footage of buildings. The construction duration would not change. During long-term operation, then, vehicle trips, VMT, and off-site energy production would be similar to the proposed project. GHG emission is not a significant and unavoidable impact of the proposed project.

7.6.4 Hazards and Hazardous Materials

This alternative would not change the location of the project site. Therefore, the same subsurface hazards and hazardous materials conditions as the proposed project are anticipated and would require to be remediated per the standards of the Department of Toxic Substances and Control. Therefore, the same regulatory requirements and mitigation measures related to site assessments would need to be implemented prior to construction. This alternative would have a similar construction impact as the proposed project. During operation, a small amount of maintenance-related chemicals would be used and the same school programs as the proposed project would be provided. This alternative would result in the same construction and operational impacts as the proposed project. Hazards and hazardous materials is not a significant and unavoidable impact of the proposed project.

7.6.5 Noise

Under this alternative, construction noise impacts would be similar to the proposed project since the same development area and total building areas would be developed. However, this alternative would result in greater groundborne vibration impacts because three historic structures would be retained on-site instead of two historic structures under the proposed project. During operation, the total enrollment and school programs would not change, therefore, the same operational noise impacts would occur, and the same number of roadway segments would be exposed to significant traffic noise impacts. This alternative would result in greater construction-related groundborne vibration impacts and the same operational noise impacts. Noise is a significant and unavoidable impact of the proposed project.

7.6.6 Recreation

Under this alternative, the historic residence would be relocated within the project site boundary and reduce the programmable space for the Eastside students in an already small school site. The historic residence would need to be placed in an area that could otherwise be used to slightly increase the size of the various recreational facilities to be provided on campus. Therefore, this alternative would have greater impacts related to recreation. Recreation impact is not a significant and unavoidable impact of the proposed project.

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7.6.7 Transportation

This alternative would not substantially increase construction-related traffic due to relocating one historic structure to a new location within the project site. Operational transportation impact would also be similar to the proposed project since the total building area for academic programs and the buildout enrollment capacity would not change. This alternative would not result in greater transportation impacts during construction and operation compared to the proposed project. Transportation is not a significant and unavoidable impact of the proposed project.

7.6.8 Tribal Cultural Resources

This alternative would have the same tribal cultural resources impacts as the proposed project during construction because the area of disturbance would not change from the proposed project. The same area would be graded and excavated and the same buildings would be demolished and/or rehabilitated. Therefore, this alternative would require the same mitigation measure pertaining to tribal cultural resources as the proposed project. As with the proposed project, no impact during operation is anticipated. Tribal cultural resources impact is not a significant and unavoidable impact of the proposed project.

7.6.9 Conclusion

The Integrated Historic Resources Alternative would have similar or less environmental impacts in all areas except for the construction groundborne vibration impacts, which would be greater. This alternative would eliminate significant and unavoidable impacts to historical resources. Although this alternative would meet all of the project objectives as described below, the cost of construction would increase substantially. The cost of relocating a historic structure is very high and may not be economically viable. While this alternative would meet the project objective of reducing operational costs, it would substantially increase the construction cost, as it would involve the cost of relocation and also the cost of rehabilitation per the DSA standards. And given the age and condition of the Wiley-Williams House, it may not be suitable for student use. Economic viability is of the factors that may be taken into account in discussing alternatives.

Project Objectives	Ability to Meet Project Objectives	Explanation
1. Provide a local school to serve the Eastside Neighborhood.	Partially	This alternative would develop an elementary school in the Eastside Neighborhood, however, this would reduce the acreage required to build school facilities on an already small school site, therefore, this project objective would be met, but not to the extent met by the proposed project.
2. Reduce operational costs associated with transporting students to widely dispersed school sites.	Yes	This alternative would develop an elementary school in the Eastside Neighborhood, therefore, this project objective would be met.
3. Provide safe vehicular and pedestrian school access by avoiding direct access via 14th Street, a major arterial.	Yes	This alternative would not place bus and parent drop-off along 14th Street, therefore, this project objective would not be met.

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7.7 MODIFIED DESIGN 14TH STREET PROJECT ACCESS ALTERNATIVE

Under this alternative, project design under Option 2 would be modified so that the main access would occur on 14th Street, which is a 4-lane arterial roadway with high traffic volumes compared to 13th Street, a local street. This alternative would move project-generated trips away from 13th Street, Park Avenue, and 12th Street, which are all local streets, reducing mobile source noise from these residential streets. This would result in lessening significant operational noise impacts. This change in access design would apply to all three options of the proposed project under this alternative. Under Option 2, which would have the most operational impact with the highest trip generation and vacation of two streets—Park Avenue and 13th Street—the proposed project would result in significant impacts on sensitive receptors along four street segments, including Howard Avenue, Victoria Avenue, 12th Street, and 13th Street. Under Options 1 and 3, which only vacate Park Street, the significant noise impacts on sensitive receptors would only occur along 13th Street. Under this alternative that modifies project access from 13th Street to 14th Street, significant operational noise impacts to 12th Street and 13th Street would likely be eliminated, while impacts to segments along Howard Avenue and Victoria Avenue would remain. This alternative would increase traffic along 14th Street, therefore, the potential for significant impacts to sensitive receptors along 14th Street could occur. It is assumed that the total building areas and other amenities under this alternative would remain the same as the proposed project.

7.7.1 Air Quality

This alternative would have similar air quality impacts as the proposed project because the area of disturbance and total building square footages would be similar to the proposed project. This alternative would only change the project access from 13th Street to 14th Street. The construction duration would remain the same. Therefore, a similar construction air quality impact is anticipated. During the operational phase, this alternative would result in similar vehicle trips and VMT impacts compared to the proposed project, because it would not change the project location or reduce the buildout enrollment capacity. This alternative would have similar construction phase and operational air quality impacts compared to the proposed project. The same construction mitigation measures would be necessary. Air quality is not a significant and unavoidable impact of the proposed project.

7.7.2 Cultural Resources

This alternative would have the same cultural resources impacts as the proposed project during construction because the area of disturbance would not change from the proposed project. The same area would be graded and excavated and the same buildings would be demolished and/or rehabilitated. Therefore, this alternative would require the same mitigation measure pertaining to historic resources and archaeological resources. Historic cultural resources impact is a significant and unavoidable impact of the proposed project.

7.7.3 Greenhouse Gas Emissions

This alternative would not reduce GHG emissions during construction because it would disturb the same surface area and build the same square footage of buildings. The construction duration would not change. During long-term operation, then, vehicle trips, VMT, and off-site energy production would be similar to the proposed project. GHG emission is not a significant and unavoidable impact of the proposed project.

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7.7.4 Hazards and Hazardous Materials

This alternative would not change the location of the project site. Therefore, the same subsurface hazards and hazardous materials conditions as the proposed project are anticipated and would require to be remediated per the standards of the Department of Toxic Substances and Control. Therefore, the same regulatory requirements and mitigation measures related to site assessments would need to be implemented prior to construction. This alternative would have a similar construction impact as the proposed project. During operation, a small amount of maintenance-related chemicals would be used and the same school programs as the proposed project would be provided. However, because the main access would occur from 14th Street, instead of 13th Street, more traffic congestion could occur, which may adversely impact emergency access. This alternative would result in slightly greater hazardous conditions related to emergency access during operation. Hazards and hazardous materials is not a significant and unavoidable impact of the proposed project.

7.7.5 Noise

This alternative would not reduce the area to be disturbed and total building area. Therefore, this alternative would have similar construction noise impacts. This alternative would reroute traffic from 13th and 12th Street to 14th Street, while street vacation of Park Avenue and 13th Street would still occur. Significant operational traffic noise impacts along 12th and 13th Streets would be eliminated under this alternative. However, significant traffic noise along Howard Avenue and Victoria Avenue would still remain since Park Avenue would be vacated. The existing noise level along 14th Street is 73 CNEL and future without project traffic volumes is 22,400 trips. Given the existing high noise level and high traffic volumes along 14th Street, it is unlikely that this alternative would result in a significant noise increase to sensitive residential uses along 14th Street.

Therefore, fewer number of roadway segments would be significantly impacted by the development of an elementary school under this alternative, therefore, operational impacts would be less than the proposed project. As with the proposed project, there are no feasible mitigation measures to reduce the noise impacts to a less than significant level. Noise is a significant and unavoidable impact of the proposed project.

7.7.6 Recreation

Under this alternative, the same recreation amenities and spaces would be provided as the proposed project under all three options. Therefore, this alternative would have similar impacts related to recreation. Recreation impact is not a significant and unavoidable impact of the proposed project.

7.7.7 Transportation

This alternative would not reduce construction-related traffic because the same development area and total building area would be developed. The same construction equipment and worker trips are anticipated compared to the proposed project. Operational transportation impact would be increased because although the total enrollment and programs would not change from the proposed project, more safety hazards are anticipated due to faster traveling speed and traffic volumes along 14th Street. This alternative would result in greater

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transportation impacts during operation compared to the proposed project. Transportation is not a significant and unavoidable impact of the proposed project.

7.7.8 Tribal Cultural Resources

This alternative would have the same tribal cultural resources impacts as the proposed project during construction because the area of disturbance would not change from the proposed project. The same area would be graded and excavated and the same buildings would be demolished and/or rehabilitated. Therefore, this alternative would require the same mitigation measure pertaining to tribal cultural resources as the proposed project. As with the proposed project, no impact during operation is anticipated. Tribal cultural resources impact is not a significant and unavoidable impact of the proposed project.

7.7.9 Conclusion

The Modified Design 14th Street Access Alternative would have similar environmental impacts in all areas for construction compared to the proposed project. For operation, this alternative would have similar or less environmental impacts in all areas as the proposed project except for operational hazards and hazardous materials and transportation impacts where greater impacts are anticipated. This alternative would meet some of the project objectives, as described below.

Project Objectives	Ability to Meet Project Objectives	Explanation
1. Provide a local school to serve the Eastside Neighborhood.	Yes	This alternative would develop an elementary school in the Eastside Neighborhood, therefore, this project objective would be met.
2. Reduce operational costs associated with transporting students to widely dispersed school sites.	Yes	This alternative would develop an elementary school in the Eastside Neighborhood, therefore, this project objective would be met.
3. Provide safe vehicular and pedestrian school access by avoiding direct access via 14th Street, a major arterial.	No	This alternative would place bus and parent drop-off along 14th Street to reduce operational noise impact, therefore, this project objective would not be met.

7.8 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. As summarized in Table 7-1, *Summary of Proposed Project and Alternatives*, both No Project Alternative and the Integrated Historic Resources Alternative are “environmentally superior” to the proposed project; therefore, Integrated Historic Resources Alternative is identified as the environmentally superior alternative.

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Table 7-1 Summary of Proposed Project and Alternatives

Topic	Proposed Project	No Project Alternative	Integrated Historic Resources Alternative	Modified Design 14th Street Alternative
5.1. Air Quality				
Short-Term Construction	LTS/MM	-	=	=
Long-Term Operation	LTS	-	=	=
5.2. Cultural Resources				
	SU/MM	-	-	=
5.3. Greenhouse Gas Emissions				
	LTS	-	=	=
5.4 Hazards and Hazardous Materials				
	LTS/MM	+	=	+
5.5 Noise				
Short-Term Construction	LTS/MM	-	+	=
Long-Term Operation	SU/NFM	-	=	-
5.6 Recreation				
	LTS	-	=	=
5.7 Transportation				
Short-Term Construction	LTS	-	=	=
Long-Term Operation	LTS	-	=	+
5.8 Tribal Cultural Resources				
	LTS/MM	-	=	=
Environmentally Superior?		Yes	Yes	No

Notes: LTS: Less Than Significant; LTS/MM: Less Than Significant with Incorporation of Mitigation Measures; SU/MM: Significant and Unavoidable With Mitigation Measures; SU/NFM: Significant and Unavoidable and No Feasible Mitigation
(-) The alternative would result in less of an impact than the proposed project.
(+) The alternative would result in more of an impact than the proposed project.
(=) The alternative would result in the same or similar impact as the proposed project.