5.0 ALTERNATIVES

5.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that an environmental impact report (EIR) describe a range of reasonable alternatives to the project, or to the location of the project, that would feasibly attain most of the basic objectives of the project while avoiding or substantially lessening any of the significant environmental impacts of the project. An EIR must include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed Project. This section identifies and describes alternatives to the proposed Project, evaluates the environmental impacts that would result from each of these alternatives, and compares these with the proposed Project, as required by CEQA.

Key provisions of the State CEQA Guidelines[1] relating to this alternatives analysis are summarized below:

- The discussion of alternatives shall focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives or would be costlier.
- The No Project Alternative shall be evaluated along with its impact. The No Project analysis shall discuss the existing conditions at the time the notice of preparation is published. Additionally, the analysis shall discuss 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 project is a development project on an identifiable property, the No Project Alternative is the circumstance under which the project does not proceed. Discussion of this alternative shall compare the environmental effects of the property remaining in its existing state to the environmental effects that would occur if the project were approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this No Project consequence should be discussed. In certain instances, the No Project Alternative means "no build," wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical results of not approving the project rather than create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.[2]
- The range of alternatives required in an EIR is governed by a "rule of reason"; therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.

1 California Code of Regulations, tit. 14, CEQA Guidelines, sec. 15126.6.
2 CEQA Guidelines, sec. 15126.6.

- 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.
- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.[3]
- The range of feasible alternatives to a proposed project is to be selected and discussed in a manner that fosters meaningful public participation and informed decision-making. 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, regulatory limitations, jurisdictional boundaries, and whether the applicant could reasonably acquire, control, or otherwise have access to the alternative site.[4]

5.2 PROJECT OBJECTIVES

The State CEQA Guidelines requires an EIR to include a statement of objectives that addresses the underlying purpose of the Project.

As described in **Section 2.0: Project Description,** the Compton Unified School District (District) is proposing to reconstruct the existing CHS campus, which would consist of (1) the demolition of all existing buildings, facilities, and athletic fields; (2) the construction of new, modern buildings, facilities, and athletic fields with a design that supports a free-flowing campus; and (3) relocation of the District's Facilities Department and Pupil Services, Enrollment Center, and Special Education offices. The reconstructed campus would be able to accommodate a total of 2,500 seats. The reconstructed CHS campus is anticipated to be opened by the 2023–2024 school year. The reconstruction of the eastern portion of the Project Site would include two 3-story academic buildings consisting of approximately 151,400 square feet; an approximately 58,500-square-foot performing arts center; an approximately 58,000-square-foot gymnasium and outdoor aquatic center; approximately 1,266,800 square feet of athletic and outdoor educational facilities; and three parking lot facilities.

The proposed Project would also involve the demolition of all existing uses on the Project Site, including the existing uses located on the 10 additional parcels along the southeastern portion of the site, and the reconstruction of the new CHS campus.

Pursuant to the State CEQA Guidelines,[5] the following objectives have been identified for the proposed Project:

3 CEQA Guidelines, sec. 15126.6(f)(3).
4 CEQA Guidelines, sec. 15126.6(f)(1).
5 CEQA Guidelines, sec. 15124(b).

- Reconstruct the existing Compton High School (CHS) campus to meet current the California Department of Education (CDE) and the Division of the State Architect (DSA) design standards and building codes, including those related to structural integrity and seismic safety.
- Create a modern, cohesive state-of-the-art high school campus that utilizes a state-of-the-art design to support a free-flowing campus with flexible spaces for learning with modern technologies.
- Minimize ongoing and repeated maintenance costs.
- Utilize the existing campus location.
- Accommodate student and faculty needs by providing classrooms and amenities that adequately support Career and Technical Education (CTE) space and programs and Next Generation Learning.
- Improve campus safety and security.
- Improve pickup/drop-off traffic/queuing to minimize off-campus traffic and provide facilities for a broad set of mobility components (bikes, pedestrians, other).
- Create a link between the CHS campus and the community by providing joint access to athletic and performing arts facilities and public service organizations.
- Relocate the District's Facilities Department and Pupil Services/Enrollment Center/Special Education classrooms.
- Provide adequate athletic facilities that are capable of hosting effective California Interscholastic Federation (CIF) programs and competitions.

5.3 ALTERNATIVES CONSIDERED AND ELIMINATED FROM FURTHER CONSIDERATION

The State CEQA Guidelines[6] requires an EIR to identify any alternatives that were considered by the Lead Agency but were rejected as infeasible and to briefly explain the reasons underlying the Lead Agency's determination. The State CEQA Guidelines states the following:

> *The EIR should also identify any alternatives that were considered by the Lead Agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the Lead Agency's determination....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.*

6 CEQA Guidelines, sec. 15126.6(c).

Several alternatives were initially considered for further evaluation in this EIR based on the potential for each to reduce or eliminate the significant environmental impacts identified for the proposed Project. The following alternatives were considered and rejected from further consideration.

5.3.1 Alternative Site

An alternative site would involve the development of the Project in a different location. Given that the District does not own or control any other vacant property near the Project Site, the ability of the District to find and purchase an alternative site would not be able to meet the Project objectives for the following reasons:

- Relocating the school could trigger changes to attendance boundaries for schools within the District depending on location. The District has no need to change attendance boundaries and desires simply to upgrade the existing school campus.
- Students who currently attend Compton High School would have to be transferred to the new campus or other schools upon completion. Students who currently walk to campus would have to be bused or driven to school, which would increase traffic.
- No vacant land that is designated or zoned for school uses currently exists; any available land would require entitlements (Zone Change, Conditional Use Permits (CUP) and variances to allow for school uses.
- Student attendance zoning or boundaries would have to be rewritten to account for the new location.
- The cost of land acquisition, demolition of the current campus, and construction of the new campus would exceed the District's budget for school development.

With the exception of joint uses on recreational facilities, relocation of the Project to an alternative site would not be feasible because obtaining an alternative site would not avoid or substantially lessen any of the significant effects of the Project. Therefore, this alternative has been eliminated from detailed consideration within this EIR.

5.3.2 Campus Modernization Alternative

Under a Campus Modernization alternative, the demolition of existing buildings and facilities would not occur, and the District uses on the existing campus would remain the same, within the same configuration and boundaries. Renovation of all campus classrooms, the administration building, and facilities would occur under this alternative.

Additionally, the reconstruction of the eastern portion of the Project Site to include two 3-story academic buildings would not occur; therefore, the existing portable classrooms would remain to maintain current

student population. Further, the construction of the gymnasium, outdoor Olympic-size swimming pool, additional tennis courts, and performing arts center would not occur.

A feasibility analysis for modernizing the existing campus was prepared for the Project and is included as **Appendix Q: Modernization Alternative Feasibility Memorandum** of this Draft EIR. In summary, this alternative would not be able to meet the Project objectives for the following reasons:

- *Reconstruct the existing Compton High School campus to meet current CDE and Division of the State Architect design standards and building codes, including those related to structural integrity and seismic safety.*

  The current campus configuration presents several challenges to meeting the objectives of meeting current design standards and building codes.

  California Department of Education Standards: CDE has authority over building and site configuration regarding classroom size and other site considerations.

  The District's goal is to include several Career Technical Education (CTE) programs in the educational program. Several of these programs—Software and Systems Development, Television Production, Health, and Robotics, for example—are technology-driven. The infrastructure required for these programs consists of data and power conduit, cable, and systems; upgraded heating, ventilation, and air conditioning (HVAC) systems; and infrastructure for program-specific equipment and fixtures. Providing these upgrades to existing campus facilities poses numerous constraints and is often cost prohibitive to insert into existing, aged spaces. The space required for the infrastructure occupies much of the existing space and reduces the overall space available for instruction, which could affect CDE approval.

  Given these spatial and cost challenges, it is not feasible to remodel the existing campus buildings to accommodate the District's intended educational program, while meeting CDE standards.

  Division of the State Architect: DSA is the authority that governs school construction in the State of California. DSA reviews structural safety, fire life safety, accessibility, energy, and irrigation for building code compliance.

  1. Uncertified Projects on Campus

     Upon completion of construction and proper inspection, the DSA will certify a project. DSA does not, however, approve new work on campuses with un-certified projects. The Compton High School campus has ten uncertified projects, spanning from 1985 through 2014.

     The nature of the items required for certification of these 10 projects is unknown at this time. Given the age and number of the uncertified projects, it can be determined that the time and expense required to gather the documents would be substantial and, moreover, is likely not feasible, especially for some of the older projects. A list of these 10 uncertified projects is provided in **Table 5.0-1: Uncertified CHS Campus Projects**.

Table 5.0-1
Uncertified CHS Campus Projects

Project No.	Project	Corrective Actions	Status	Date
03-103695	Alteration to 5 CR bldgs., Shop Bldg., Music Bldg.	School to be demolished in 2019	#3 Close of File w/o Certification – Exceptions	4/17/2008
55581	Construction of Fire and Alarm System	School to be demolished in 2019	#3 Close of File w/o Certification – Exceptions	4/28/1994
03-112761	Alterations to entire Campus (Fire Alarm upgrade)	School to be demolished in 2019	#3 Close of File w/o Certification – Exceptions	3/26/2014
03-103658	Construction of Fire and Alarm System	School to be demolished in 2019	#3 Close of File w/o Certification – Exceptions	1/15/2008
62303	Construction of Fire and Alarm System	School to be demolished in 2019	#3 Close of File w/o Certification – Exceptions	3/25/2010
64175	Construction of Fire and Alarm System	School to be demolished in 2019	#3 Close of File w/o Certification – Exceptions	9/6/2000
46809	Construction of Fire and Alarm System	School to be demolished in 2019	#3 Close of File w/o Certification – Exceptions	6/29/1993
46930	Construction of Fire and Alarm System	School to be demolished in 2019	#3 Close of File w/o Certification – Exceptions	7/1/1993
44751	Construction of Fire and Alarm System	School to be demolished in 2019	#3 Close of File w/o Certification – Exceptions	5/30/1985
50109	Construction of Fire and Alarm System	School to be demolished in 2019	#3 Close of File w/o Certification – Exceptions	3/3/2008

Source: Compton Unified School District, Facilities Department. September 25, 2018.

Should the District opt to move forward with certification, the process would impact the schedule for all new work, delaying it by several years at minimum. This delay would jeopardize securing State new construction funding due to dwindling funds and the backlog of other districts' seeking to encumber those funds. Expenses would involve architects' and engineers' fees for reviewing built installations and filing documents, as well as inspection fees. Reviewing built installations may require removal of building components, such as ceilings and wall finishes, so that internal systems can be reinspected and documented. If those inspections uncover installations that are not code compliant, rework may be necessary.

However, if a building or installation related to an uncertified project is demolished, certification of it is not required.

2. Seismic Safety

Most of the buildings on the campus were built under less stringent seismic and structural safety building codes and standards. Five of the existing buildings (classrooms, gymnasium, boys' locker room, girls' locker room, and truancy center) have been found to have "deficiencies associated

with a high potential" for collapse in the event of a significant earthquake. Preliminary Evaluation Reports, dated March 1, 2017, were generated by KNA Consulting Engineers, using information found in as-built drawings and documents, and are provided in **Appendix Q** of the Draft EIR.

It should also be noted that drawings and other construction related documentation for the existing administration building and auditorium are not available. Any significant work on it would trigger a complete structural and seismic upgrade to the building—a DSA requirement. Most of the structural components are hidden (beams, columns, framing, and structural connections between them) or buried (foundations, concrete reinforcing), so a significant amount of destructive testing and building documentation would be necessary to determine what mitigation and repair measures are necessary to bring the building into compliance with current building codes.

- *Create a modern, cohesive high school campus that utilizes a state-of-the-art design to support a free-flowing campus with flexible spaces for learning with modern technologies.*

  Numerous additions over the years have resulted in a highly fragmented campus. The fragmentation makes wayfinding and supervision difficult. Gathering and social spaces are few, small, and highly dispersed.

  The District has a vision for the future of Compton High School that will emphasize Next Generation Learning teaching methods. A Next Generation Learning facility involves open, flexible, adaptable, and cohesive spaces that encourage students to "learn anywhere," and provides a variety of comfortable, safe learning environments. The current Compton High School campus has segregated, distinct buildings that isolate learning activities to specific rooms and areas that do not allow for the flexibility and interaction which define Next Generation Learning.

  CTE programs are also a fundamental component of the District's vision. CTE involves learning skills by hands-on learning. Please see the previous discussion of CTE, related to CDE requirements, above.[7]

  Most of the existing buildings are one-story, which creates an inefficient use of the space on the site. This arrangement does not allow space for expansion, nor for the planned gym and swimming pool.

- *Minimize ongoing and repeated maintenance costs.*

  Maintaining the equipment and infrastructure for utilities systems is a large concern on the campus. Various additions to the power, data, and HVAC systems have used exposed conduit and ducts, which are highly vulnerable to damage from weather, vandalism, and general wear and tear. Reworking these exposed systems will affect classroom sizes. A related concern is that pathways for these interconnected systems are not clear and disconnecting a cable at one building will likely affect systems at many other buildings.

7 The CTE is created by Education Code Section 51226. Standards are published by the CDE, https://www.cde.ca.gov/ci/ct/sf/ctemcstandards.asp

A related issue is the type of HVAC and lighting systems currently in use. These systems are older and less efficient than what is currently required by the California Energy Code. Updated systems would have lower operating costs.

- Accommodate student and faculty needs by providing classrooms and amenities that adequately support Career and Technical Education (CTE) space and programs and Next Generation Learning.

Refer to the previous discussion regarding CDE requirements, and the challenges in making space for conduit pathways in existing older buildings on the campus. Also refer to the previous discussion regarding maintenance as the pathways installed on existing building are often exposed and vulnerable to wear and damage.

- *Improve campus safety and security.*

  As previously indicated, additions have resulted in a fragmented campus configuration. The configuration currently consists of a quad to the north of the administration building and several interstitial spaces between buildings, with few clear visual links between the spaces. This configuration impedes supervision of the interstitial spaces. Additionally, the perimeter entrances to the campus are porous and difficult to monitor.

- *Improve pickup/drop-off traffic/queuing to minimize off-campus traffic and provide facilities for a broad set of mobility components (bikes, pedestrians, other).*

  The existing parking configuration allows vehicular traffic right into the campus heart, adjacent to campus buildings. The placement of the existing buildings, at the perimeter of the campus, particularly along S. Acacia Avenue, does not allow the space for changing that configuration.

- *Create a link between the Compton High School campus and the community by providing joint access to athletic and performing arts facilities and public service organizations.*

  Existing athletic and performance facilities are at the heart of the campus, with no separation between those areas and the surrounding campus. This arrangement creates two challenges: (1) unwanted public access to the main campus; and (2) visibility of the athletic and performance areas from the campus exterior. Visual links between the community and the campus also affect safety and security.

Rough Order of Magnitude Cost to Modernize the Existing Campus

As stated in the California Education Code,[8] if the cost to repair a facility is more than 50 percent of the replacement cost, the CDE may recommend that the facility be abandoned and replaced. While this "rough order of magnitude" cost is preliminary, the analysis does indicate that modernization and remodel costs would exceed that threshold.[9] According to the DLR feasibility analysis, these

8 Sections 17251(c) and 33031, Education Code. Reference: Sections 16044, 16047, 16104, and 16190 through 16207, Education Code.

9 Rough order of magnitude costs shown below are based on data gathered from recent bids accrued by DLR and by projects estimated by C.P. O'Halloran and Rider Levett Bucknall. These costs take into account the combination of remodels, modernizations, and seismic upgrades.

modernization costs in total are roughly $132 million, whereas the cost estimate for the Project is approximately $210 million. Itemization of the cost estimate is provided in **Appendix Q** of this Draft EIR**.** Given that there are many hidden, unknown building elements, the actual modernization cost would likely be substantially greater than estimated. The modernization costs are roughly 63 percent of the Project costs, far greater than the 50 percent threshold established by the California Education Code and CDE.

Benefits to Students, Faculty, Staff and Community

In addition, the following benefits of reconstructing the campus would not be achieved with the Campus Modernization Alternative:

Facilities that support Next Generation Learning and are flexible enough to adapt to a variety of learning and teaching modalities.

- Facilities that comply with California Department of Education standards.
- A cohesive, well-organized campus that is easy to navigate and allows controlled entry.
- Durable, beautiful, and efficient building components and systems that are easy to maintain.
- Buildings that comply with current building codes regarding seismic safety, fire and life safety, accessibility, and energy efficiency.
- A campus that supports a variety of activities, including those shared by the community such as sports and performing arts.
- A cost-effective use of District funds.

Given that the Campus Modernization Alternative would not meet any of the Project objectives, or provide the District's desired benefits to the students, faculty, staff, and community, this alternative is rejected and was not considered further in this analysis.

5.4 ALTERNATIVES CONSIDERED

The following alternatives were identified for evaluation:

- **Alternative 1:** No Project Alternative
- **Alternative 2:** Proposed Project without Acquisition Parcels Alternative
- **Alternative 3:** Reduced Sized Campus Project with Acquisition Parcels Alternative

Each of these alternatives is described in more detail in the following sections.

5.5 ALTERNATIVES ANALYSIS

A comparison of the impacts of the Project and the alternatives selected for further evaluation is provided in this section for each of the environmental topics addressed in the Draft EIR. This comparison of impacts

assumes, for each topic, that the mitigation measures identified in this Draft EIR for the Project would also be incorporated into the alternatives.

In accordance with the State CEQA Guidelines, the discussion of the environmental effects of the alternatives in an EIR may be less detailed than provided for in the proposed Project but should be sufficiently detailed to allow meaningful evaluation, analysis, and comparison with the proposed Project.[10]

5.5.1 Alternative 1—No Project Alternative

Under the No Project Alternative, the current CHS campus would continue to operate under existing conditions. The No Project Alternative would only involve maintenance and repairs required to sustain the existing campus, including repair and maintenance of existing structures necessary to maintain compliance with current codes and regulations. The No Project Alternative would not demolish any of the existing buildings, facilities, and athletic fields, or construct new, modern buildings, facilities, and athletic fields with a design that supports a free-flowing campus. The No Project Alternative would not relocate the District's Facilities Department and Pupil Services, Enrollment Center, and Special Education offices.

As previously stated, upon completion of construction and proper inspection, the DSA will certify a project. DSA does not, however, approve new work on campuses with uncertified projects. The CHS campus has ten 10 projects, spanning from 1985 through 2014.

The nature of the items required for certification of these 10 projects is unknown at this time. Given the age and number of the uncertified projects, it can be assumed that the time and expense required to gather the documents would be substantial, and is likely not feasible, especially for some of the older projects. As noted previously, a list of these 10 uncertified projects is provided in **Table 5.0-1**. Under the No Project Alternative, the District would be required to make the necessary corrections to certify these 10 projects. This alternative would not acquire the 10 parcels south of the existing campus. Existing buildings, athletic fields, and school campuses would continue to deteriorate. The No Project Alternative may include ongoing minor essential projects, such as HVAC repairs needed to maintain classroom temperatures; necessary repairs to infrastructure; seismic retrofitting efforts; repair of portable classrooms; maintenance of fire alarm and fire suppression systems; and abatement of any existing asbestos and lead-based paint that may be present (if any). This alternative accommodates a total of 3,186 student classroom seats.

10 California Code of Regulations, tit. 14, CEQA Guidelines sec. 15126.6(d).

Aesthetics

The No Project Alternative would maintain the existing CHS campus and the existing uses on the acquisition parcels. No construction- or operation-related changes would occur to the visual quality of the site or to the existing views across the site. The existing visual characteristics and quality of the surrounding Project Site would also remain unchanged under this alternative. Given that the change in the visual character of the Project Site and the surrounding area that would result from the Project was determined to be less than significant, this alternative would have similar impacts to the Project. In regard to light and glare, the Project would result in less than significant impacts through the incorporation of various design elements and compliance with California Building Code (CBC) lighting standards. However, the No Project Alternative would not introduce any new sources of light or glare on the Project Site. While impacts on aesthetics would be less than significant under the Project, potential impacts related to light and glare under this alternative would be reduced when compared to the Project.

Air Quality

The No Project Alternative would not alter the existing uses or include the development of any new buildings on the Project Site. As a result, related air pollutant emissions would not be generated from construction activities. Furthermore, no change in operational air pollutant sources from the Project Site would occur. However, the No Project Alternative currently emits more air quality operational emissions when compared to the Project. The reconstructed CHS campus, as proposed by the Project, would result in improved energy and water conservation efficiencies because it would meet current building standards. In addition, given that the student enrollment for the proposed Project would be less than existing student capacity of the CHS campus, there would be a reduction in the amount of mobile emissions. Therefore, overall impacts under this alternative would greater for operational emissions and fewer for construction emissions when compared to the Project but would still be less than significant.

Biological Resources

Under the No Project Alternative, the existing biological character of the Project Site would remain unchanged. The Project's potential impact on nesting birds would be reduced to less than significant through implementation of **Mitigation Measure MM BIO-1.** However, the No Project Alternative would not result in the removal of existing trees on the Project Site, and the removal of street trees would not occur. While impacts on biological resources would be less than significant under the Project, potential impacts under this alternative would be reduced when compared to the Project.

Cultural Resources

Under the No Project Alternative, the Project Site would remain in its current condition. The Project involves grading of the Project Site that has the potential to disturb any subsurface cultural resources that might be present on the Project Site. The Project would result in less than significant impacts on cultural resources through the implementation of **Mitigation Measures MM CUL-1, MM CUL-2, MM CUL-3,** and **MM CUL-4.** Given that this alternative does not involve any disturbance of subsurface soils, the potential disturbance to cultural resources would be avoided. In regard to historic resources, the Project would result in less than significant impacts on historic resources because none of the buildings on the Project Site are listed or eligible for listing in either the National Register of Historic Places (National Register) or the California Register of Historic Resources (California Register). Implementation of this alternative would not result in the demolition of any buildings on the Project Site. While impacts on cultural and historic resources would be less than significant under the Project, impacts would be reduced when compared to the Project.

Energy

Under the No Project Alternative, a minimal need would exist for fuel and electricity for Project construction because the site would need only minor repairs. Therefore, the No Project Alternative would not generate a short-term demand for energy (including electricity, petroleum, and/or natural gas) during construction, and construction related impacts to energy would not occur. While the Project would result in less than significant impacts with regard to energy, the energy efficiency that would come with the new high-performance building design and conservation measures of the Project would not be realized. As such, the overall impacts of this alternative would be greater as compared to the Project but would remain less than significant.

Geology and Soils

Under the No Project Alternative, the Project Site would remain in its existing condition, and no grading or construction of new building or facilities would occur. The Project would result in less than significant impacts related to geology and soils through compliance with DSA IR-A-24 and incorporation of the recommendations presented in the Geotechnical Report (see **Appendix J** of this Draft EIR). It should also be noted that implementation of the Project would reconstruct the existing CHS campus to meet current CDE and DSA standards and building codes, including those related to structural integrity and seismic safety. While the No Project Alternative would not alter the existing topography or geologic landforms that could exacerbate existing environmental conditions associated with seismic fault rupture, strong seismic ground shaking, liquefaction, landside/lateral spreading, seismic-induced settlement, subsidence soil stability, expansive soils, or acceleration of geologic hazards, it could expose people or structures to

potential seismic hazards. As such, the No Project Alternative would have greater potential impacts related to geology and soils when compared to the Project.

Greenhouse Gas Emissions

The No Project Alternative would not alter the existing uses or include the development of any new buildings on the Project Site. As a result, no new greenhouse gas (GHG) emissions would be generated from construction activities. However, the No Project Alternative would emit more GHG operational emissions when compared to the Project. While the Project would result in less than significant impacts with regard to energy, the energy efficiency that would come with the new high-performance building design and conservation measures of the Project would not be realized. In addition, the Project would result in a reduction in total number of students on the Project Site. As such, overall impacts under the No Project Alternative would be greater, as compared to the Project, but would still be less than significant.

Hazards and Hazardous Materials

Under the No Project Alternative, there would be no potential to create upset or accident conditions involving the release of hazardous materials into the environment during either construction or operation. The No Project Alternative would not release subsurface hazardous substances to the environment or expose future occupants or site users to hazardous materials. Under the No Project Alternative, no new structures would be constructed on a site that is included on a list of hazardous materials sites. The No Project Alternative would not change vehicular circulation routes and patterns or impede public access or travel upon public rights-of-way because no new structures or access routes would be constructed. The No Project Alternative would eliminate the Project's potentially significant impacts associated with long-term exposure for faculty and staff and therefore would not require the implementation of **Mitigation Measure MM HAZ-1.** The No Project Alternative would have reduced impacts with respect to hazards and hazardous materials, as compared to the Project, which would be less than significant.

Hydrology and Water Quality

Under the No Project Alternative, the Project Site would remain in its current condition, and no grading or development would occur. Existing stormwater flows across the Project Site would continue to occur and the existing hydrologic and drainage patterns would remain unchanged. Although the Project would incorporate Best Management Practice (BMPs) to ensure that impacts related to hydrology and water quality during operation would be less than significant, impacts under this Alternative would be similar compared to the Project.

Land Use and Planning

Under the No Project Alternative, no new development would occur and there would be no changes to the existing land uses on the site. The existing CHS campus would continue to operate in its current state and the residential and commercial uses on the acquisition parcels would remain. This alternative would not conflict with applicable land use plans, policies, or regulations. While impacts on land use and planning would be less than significant under the Project, these impacts under this Alternative would be reduced when compared to the Project.

Noise

Under the No Project Alternative, no construction activities would occur, and therefore no construction-related noise or vibration would be generated on-site or off-site. The Project would result in less than significant impacts related to construction noise through implementation of **Mitigation Measures MM N-1** and **MM N-2**. Thus, construction noise impacts under this alternative would be reduced when compared to the Project.

Furthermore, as the No Project Alternative would not result in development of new and expanded uses, there would be no change to the existing ambient noise level on the Project Site. Under the Project, operational noise would be generated by people using outdoor spaces, vehicles, athletic fields, roadway noise, and building equipment. Implementation of the No Project Alternative would result in the operation of similar uses on the Project Site compared to the Project, thus operational noise would be similar. Therefore, construction and noise under this alternative would be reduced when compared to the Project.

Population and Housing

Under the No Project Alternative, no new development would occur and there would be no changes to the existing land uses on the site. The Project would result in less than significant impacts related to as it is not anticipated to result in an increase of faculty and staff and would therefore not introduce any permanent residents or workers to the area as a result of construction. Under this alternative, construction would not occur, and no structures would be developed on the Project Site that would house residents. In addition, this alternative would not introduce additional employees that would generate new residents. Thus, the alternative would result in similar impacts related to population growth when compared to the Project.

Furthermore, under this alternative the District would not acquire the residential properties on the southeast of the Project Site. As such, these residential uses would remain, and the existing residents would not be displaced. Although the Project would result in less than significant impacts related to the

displacement of existing housing and people, impacts under this alternative would be reduced compared to the Project.

Transportation and Traffic

Under the No Project Alternative, no new development would occur at the Project Site occur and there would be no changes to the existing land uses on the site. The Project would result in less than significant construction impacts through implementation of a construction traffic management plan (TMP). The Project would also reduce potential impacts for parking facilities during after-school and weekend events through implementation of **Mitigation Measure MM TRAF-1.** However, the No Project Alternative would avoid both construction and operation related traffic impacts of the Project. This Alternative would not result in any construction activities, nor would operation generate new vehicle trips or any changes to existing access or circulation patterns. While transportation and traffic impacts would be less than significant under the Project, potential impacts under this alternative would be reduced when compared to the Project.

Summary of Impacts

Implementation of the No Project Alternative would reduce environmental impacts when compared to the proposed Project. At the same time, the energy efficiency that would come with new, updated facilities and structures and landscaping would not be realized. As summarized in **Section 4.0: Environmental Analysis** of this Draft EIR, all potentially significant environmental impacts of the proposed Project can be reduced to less than significant levels through adherence to regulatory requirements, incorporation of design features, and the implementation of mitigation measures. Impacts to aesthetics; biological resources; cultural resources; hazards and hazardous materials; land use and planning; noise; population and housing; and transportation and traffic would be reduced under this alternative when compared to those for the proposed Project. Impacts to hydrology and water quality would be considered similar under the No Project Alternative. Impacts to air quality; energy; geology and soils; and GHG emissions would be greater under this alternative when compared to those for the proposed Project. A summary of impacts is provided in **Table 5.0-4: Comparison of Alternatives to the Project**.

Relationship to Project Objectives

While potentially significant impacts would be reduced with this Alternative, the following Project objectives would not be achieved with the No Project Alternative:

- Reconstruct the existing Compton High School campus to meet current CDE and Division of the State Architect design standards and building codes, including those related to structural integrity and seismic safety.

- Create a modern, cohesive high school campus that utilizes a state-of-the-art design to support a free-flowing campus with flexible spaces for learning with modern technologies.
- Minimize ongoing and repeated maintenance costs.
- Accommodate student and faculty needs by providing classrooms and amenities that adequately support Career and Technical Education (CTE) space and programs and Next Generation Learning.
- Improve campus safety and security.
- Improve pickup/drop-off traffic/queuing to minimize off-campus traffic and provide facilities for a broad set of mobility components (bikes, pedestrians, other).
- Relocate the District's Facilities Department and Pupil Services, Enrollment Center, and Special Education offices.
- Provide adequate athletic facilities that are capable of hosting effective California Interscholastic Federation (CIF) programs and competitions.

5.5.2 Alternative 2—Proposed Project without Acquisition Parcels Alternative

The proposed Project without Acquisition Parcels Alternative would involve the development of the campus similar to the proposed Project, although without the acquisition of the ten parcels on the southern border of the campus (two-acre area south of W. Cocoa Street). This alternative also would not include the vacation of W. Cocoa Street.

As with the proposed Project, this alternative would entail the demolition of all existing buildings, facilities, and athletic fields; and the construction of new buildings, facilities, and athletic fields and the relocation of the District's Facilities Department and Pupil Services, Enrollment Center, and Special Education offices.

The site plan configuration of the reconstructed campus under this alternative would include the 58,500-square-foot performing arts center located north of W. Cocoa Street, immediately south and adjacent to the proposed two 3-story academic buildings, which total approximately 151,400 square feet. The proposed 142-space East parking lot would be located along S. Acacia Avenue at W. Myrrh Street.

As shown in **Table 5.0-2: Proposed Project without Acquisition Parcels Alternative Components**, this alternative also involves the 58,000-square-foot gymnasium and outdoor aquatic center; approximately 1,266,800 square feet of athletic and outdoor educational facilities; and three parking lot facilities.

Table 5.0-2
Proposed Project without Acquisition Parcels Alternative Components

Proposed Use	Approximate Square Footage (sf)
Educational/Administrative Facilities	
Academic buildings	151,400
Performing arts center	58,500
Athletic and Outdoor Educational Facilities	
Gymnasium and aquatic center	58,000
Football stadium, baseball/softball fields, soccer fields, tennis courts, and basketball courts	1,266,800
Parking Facilities	
North parking lot (173 spaces)	139,610
East parking lot (142 spaces)	120,220
South parking lot (48 spaces)	33,300
Total	**1,827,830**

Note: sf = square feet.

This alternative would be able to accommodate a total of 2,500 student classroom seats.

Aesthetics

The Proposed Project without Acquisition Parcels Alternative would incorporate similar project design features as the Project, which would result in similar construction and operation-related changes to the visual quality of the site. The only difference would be that the acquisition area would retain the existing commercial and residential uses. The Proposed Project without Acquisition Parcels Alternative would also have similar impacts to the visual character of the Project Site, and thus, views of the surrounding area across the site would be similar. This Alternative would also have similar light and glare impacts, which would be reduced through the incorporation of various design elements and compliance with CBC lighting standards. Therefore, this Alternative would have similar less than significant impacts on aesthetics when compared to the Project.

Air Quality

As with the Project, construction of the Proposed Project without Acquisition Parcels Alternative has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. However, compared to the Project, this alternative would not include demolition activities for the acquisition parcels. Impacts under this alternative related to construction air quality would remain less than significant for all criteria pollutants and localized pollutant concentrations during construction. Impacts under this alternative would be reduced when compared to the Project.

In regard to operations, the alternative would emit similar air quality emissions compared to the Project as the proposed building areas would be similar. Traffic generated from this alternative would remain similar to the Project based on uses. Accordingly, impacts of this alternative with respect to regional criteria pollutant emissions would be similar when compared to the less than significant impacts under the Project.

Biological Resources

Under the Proposed Project without Acquisition Parcels Alternative, construction would occur on the existing CHS campus of the Project Site except for the acquisition parcels. Similar to the Project, the removal of trees during demolition and site construction could disturb habitat for nesting birds. Birds as designated by the MBTA, including raptors, or nests or eggs of any bird, except as otherwise provided by the CDFW Code, may not be taken, possessed, or destroyed at any time, therefore this Alternative would also require the implementation of **Mitigation Measure MM BIO-1** to reduce impacts to a level of less than significant. Furthermore, this alternative would not result in the removal of designated street trees within the acquisition area. Although the Project would result in less than significant impacts through adherence to Compton Municipal Code Section 20-4 and approval from the City's Public Works Director, impacts under this alternative would be reduced when compared to the Project.

Cultural Resources

The Proposed Project without Acquisition Parcels Alternative would redevelop the existing CHS campus but would not result in development of the acquisition parcels. This Alternative would have similar potential to uncover previously unknown archeological resources. As with the Project, this alternative would be required to adhere to regulatory requirements and implement **Mitigation Measures MM CUL-1, MM CUL-2, MM CUL-3,** and **MM CUL-4** to ensure impacts to cultural resources would be less than significant. In regard to historic resources, this alternative would not result in the demolition of any buildings or structures that are listed or eligible for listing in either the National Register or the California Register. Thus, this alternative would result in similar less than significant impacts on cultural and historic resources when compared to the Project.

Energy

The overall amount of development under the Proposed Project without Acquisition Parcels Alternative would be similar compared to the Project. Similar to the Project, this alternative would be designed in accordance with the 2016 standards of Title 24, California's Energy Efficiency Standards for buildings and the State Energy Conservation Standards. These standards include minimum energy efficiency requirements related to building envelope, mechanical systems (e.g., HVAC and water heating systems), indoor and outdoor lighting, and illuminated signs. This alternative would incorporate similar energy

efficiency measures to the Project that would meet and exceed State standards and, therefore, would not result in the inefficient, unnecessary, or wasteful use of energy. As such, this alternative would result in similar less than significant impacts on energy when compared to the Project.

Geology and Soils

The Proposed Project without Acquisition Parcels Alternative would have comparable construction activities for the development of the reconstructed CHS campus. The removal of acquisition parcels from the Project Site under this alternative would not result in a substantial change in the development activities. Impacts related to the exacerbation of site-specific geologic hazards including seismic fault rupture, strong seismic ground shaking, liquefaction, landside/lateral spreading, seismic-induced settlement, subsidence soil stability, expansive soils and erosion would be similar to those under the Project because such impacts are a function of the site's underlying geologic conditions rather than the intensity of proposed uses. Thus, this alternative's grading and site preparation activities would be similar and would result in similar impacts through compliance with DSA IR-A-24 and incorporation of the recommendations presented in the Geotechnical Report (see **Appendix J** of this Draft EIR). This alternative would also involve the reconstruction of the CHS campus to provide buildings and facilities that meet current CDE and DSA standards and building codes, including those related to structural integrity and seismic safety. As such, this alternative would result in similar less than significant impacts on geology and soils when compared to the Project.

Greenhouse Gas Emissions

Under the Proposed Project without Acquisition Parcels Alternative, similar construction activities would occur although the intensity of such may be reduced due to not occurring over the acquisition parcels. As such, new GHG emissions would be generated from construction activities would be reduced compared to the Project as the demolition of buildings on the acquisition parcels would not occur. In addition, this alternative would emit similar GHG operational emissions compared to the Project. Daily trips associated with this alternative, upon which the calculations of GHG emissions are mainly based, would be similar to that of the Project as there would be the same proposed student capacity. Impacts under this alternative would be reduced when compared to the Project.

Hazards and Hazardous Materials

Under the Proposed Project without Acquisition Parcels Alternative, there would be potential to create upset or accident conditions involving the release of hazardous materials into the environment during either construction or operation. For construction activities, similar to the Project, all potentially hazardous materials would be used and stored in compliance with applicable federal, State, and local regulations.

The existing campus is located on a site that is included on a list of hazardous materials pursuant to Government Code 65962.5, which is the Hazardous Waste and Substances (Cortese) List.[11] A review of the Cortese List compiled on the DTSC, the SWRCB, and CalEPA conducted as part of the Phase I ESA notes that the Project Site is on the CA HAZNET database. The site is listed for hazardous waste storage and transfer, and for asbestos-containing waste. However, similar to the Project, this alternative would not release subsurface hazardous substances to the environment or expose future occupants or site users to hazardous materials. In addition, the alternative would not include the sites located at 327-329 W. Alondra Boulevard for asbestos-containing waste, 339 W. Alondra Boulevard for industrial waste discharge, and 341 W. Alondra Boulevard for a gas station. Prior to construction activities, any structures potentially containing hazardous materials should be inspected. If any potentially hazardous materials are found, removal should be implemented under the DTSC standards. As such, this alternative would have no impacts with respect to these parcels.

As part of the environmental review, an Air Toxics Health Risk Assessment (HRA) (see **Appendix D** of this Draft EIR) for the Project has been prepared to address specific requirements of both CDE and CEQA to evaluate whether facilities have the potential for generating hazardous and acutely hazardous air emissions within a quarter-mile (1,320 feet) radius of the Project site. As noted, the HRA found that the summation of risk totals of 1.1 in 100,000 (1.1E-05) for adults (faculty and staff) exceeds the established threshold of 1 in 100,000 (1.0E-05) for long-term exposure (40 years) for faculty and staff. However, the risk factor for students is calculated to be 8.4 in 10,000,000 (8.4E-07) for a 4-year exposure, which does not exceed the significance threshold of threshold of 1 in 100,000 (1.0E-05). The alternative would have similar results when compared to the Project. Therefore, impacts for long-term exposure for faculty and staff would be potentially significant, while impacts to students would be less than significant. As with the Project, the alternative would implement **Mitigation Measure MM HAZ-1** to reduce potentially significant impacts to a less than significant level. As such, impacts under this Alternative would be reduced when compared to the Project.

Hydrology and Water Quality

Similar to the Project, the Proposed Project without Acquisition Parcels Alternative would require the construction of new storm-drain systems, including retention basins used to retain the 100-year flood event. As such, construction activities under this alternative would involve temporary surface water runoff and water quality impacts. Construction of the alternative would also require adherence to the State NPDES permit for construction-related activities from the SWRCB. The permit would require the

11 State Water Resources Control Board (SWRCB), *GeoTracker* (2015), database, accessed February 12, 2018, https://geotracker.waterboards.ca.gov/map/.

preparation and implementation of a project-specific Storm Water Pollution Prevention Plan (SWPPP) that indicates which BMPs are intended to reduce erosion, sedimentation, and nonpermitted discharges of materials during construction. Thus, this alternative would incorporate BMPs, such as the incorporation of landscaping features and bioswales, and comply with applicable regulations to ensure that water discharge does not exceed current conditions. This alternative would result in greater hydrology and water quality impacts when compared to the Project as the existing impermeable surfaces present in the 10 parcels southeast of the campus would remain, along with the potential for contaminated runoff associated with the existing uses.

Land Use and Planning

Implementation of Proposed Project without Acquisition Parcels Alternative would not involve any changes in existing uses on the CHS campus because it would remain as school uses. Thus, this alternative would not conflict with applicable land use plans, policies, or regulations. While impacts on land use and planning would be less than significant under the Project, these impacts under this alternative would be reduced when compared to the Project.

Noise

Under the Proposed Project without Acquisition Parcels Alternative, construction activities would occur although the intensity of such may be reduced due not occurring over the acquisition parcels. However, the intensity of each construction phase would remain similar to the Project. As such, this alternative would not eliminate the Project's potentially significant noise impacts during construction and therefore would require the implementation of **Mitigation Measures MM N-1** and **MM N-2** to reduce impacts for nearby sensitive receptors. Similar to the Project, with the implementation of mitigation, impacts under this alternative would be less than significant.

Operational noise would be generated by people using outdoor spaces, vehicles, the PAC and new athletic fields, roadway noise, and building equipment. Similar to the Project, this alternative would result in a negligible increase in operational noise compared to existing conditions based on existing conditions and the number of daily trips to the site. This alternative would result in similar less than significant impacts on construction and operational noise when compared to the Project.

Population and Housing

Similar to the Project, the Proposed Project without Acquisition Parcels Alternative would not include residential land uses nor would it result in an increase of faculty and staff. As this alternative would not introduce additional employees that would generate new residents, it would result in similar impacts related to population growth when compared to the Project. Furthermore, under this alternative the

District would not acquire the residential properties on the southeast of the Project Site. As such, these residential uses would remain and the existing residents would not be displaced. Although the Project would result in less than significant impacts related to the displacement of existing housing and people, impacts under this alternative would be reduced compared to the Project.

Transportation and Traffic

The Proposed Project without Acquisition Parcels Alternative would consist of the demolition of all existing uses on the Project Site and the reconstruction of the new CHS campus facilities similar to the Project, with the exception of the acquisition area. This alternative would also include the same proposed student capacity as proposed by the Project and thus, would generate the same number of daily and peak hour trips that would be generated under the Project. Since impacts to all study intersections associated with the Project would be less than significant, the impacts associated with this alternative would also be less than significant. Similar to the Project, this alternative would also be required to reduce potentially significant impacts on parking for after-school and weekend events through implementation of **Mitigation Measure MM TRAF-1**. Therefore, this Alternative would result in similar less than significant impacts on transportation and traffic when compared to the Project.

Summary of Impacts

Implementation of the Proposed Project without Acquisition Parcels Alternative would reduce environmental impacts when compared to the proposed Project. As summarized in **Section 4.0** of this Draft EIR, all potentially significant environmental impacts of the proposed Project can be reduced to less than significant levels through adherence to regulatory requirements, incorporation of design features, and the implementation of mitigation measures. Impacts to air quality; biological resources; GHG emissions; hazards and hazardous materials; land use and planning; and population and housing would be reduced under this alternative when compared to those for the proposed Project. Impacts to aesthetics; cultural resources; energy; geology and soils; noise; and transportation and traffic would be considered similar under this alternative when compared to those for the proposed Project. Impacts to hydrology and water quality would be greater under this alternative when compared to those for the proposed Project. A summary of impacts is provided in **Table 5.0-4**.

Relationship to Project Objectives

While potentially significant impacts would be reduced with this alternative, the following Project objectives would not be achieved with the Proposed Project without Acquisition Parcels Alternative:

- Create a modern, cohesive high school campus that utilizes a state-of-the-art design to support a free-flowing campus with flexible spaces for learning with modern technologies.

This objective would not be achieved to the level of the proposed Project as accessibility to the campus and performing arts center would be hindered by the existing uses occupying the 10 parcels southeast of the campus. The existing uses would obstruct the desired free-flowing nature of the campus as circuitous pathways extending from parking lots and campus entry points to class rooms and other facilities would be required. The walking distance from the proposed east parking lot to the performing arts center is substantially further under this alternative.

- Improve pickup/drop-off traffic/queuing to minimize off-campus traffic and provide facilities for a broad set of mobility components (bikes, pedestrians, other).

  This objective would not be achieved to the level of the proposed Project as accessibility to the campus and performing arts center would be hindered by the existing uses occupying the 10 parcels southeast of the campus. The walking distance from the proposed east parking lot to the performing arts center is substantially further under this alternative. Additionally, vehicle, pedestrian, and bike approach to the Campus would continue to be redirected around these uses, thereby slowing traffic and queuing.

- Create a link between the Compton High School campus and the community by providing joint access to athletic and performing arts facilities and public service organizations.

This objective would not be achieved to the level of the proposed Project as linkage and access to the campus athletic and performing arts facilities would be hindered by the existing uses occupying the 10 parcels southeast of the campus. Further, the walking distance to the various athletic fields from the east and south parking lots would be substantially further under this alternative. This would also apply to community access to the performing arts center from drop-off locations such as the parking lots. This distance could be perceived as insurmountable to those with disabilities as well as elderly individuals.

5.5.3 Alternative 3—Reduced Size Campus Project with Acquisition Parcels Alternative

The Reduced Size Campus Project with Acquisition Parcels Alternative would consist of the demolition of all existing uses on the Project Site and the reconstruction of the new CHS campus facilities within the same boundaries of the Project Site, which includes the additional 2 acres south of W. Cocoa Street.

The reconstruction of the eastern portion of the Project Site under this alternative would include the construction of a slightly smaller campus in terms of total building square footage including two 3-story academic buildings for a total of approximately 191,600 square feet; a two-story, approximately 79,900-square-foot gymnasium and aquatic center; and a one-story, approximately 14,900-square-foot administration building. The southeastern portion of the Project Site would include a community park with a basketball court at W. Alondra Boulevard and S. Acacia Avenue, and the vacation of W. Cocoa Street. The southwestern portion of the Project Site under this Alternative would include the construction

of a 34,400-square-foot performing arts center adjacent to W. Alondra Boulevard. Under this alternative, the smaller performing arts center would not include facilities for the following Performing Arts and Production and Managerial Arts CTE programs: Digital Music Production, Video Production, and TV Production. The following elements of the CTE program would not be realized under this alternative: production labs and studios, editing rooms, control rooms, sound stage, storage, and related infrastructure space.[12]

As shown in **Table 5.0-3: Reduced Size Campus Project Alternative with Acquisition Parcels Components**, this alternative involves a 79,900-square-foot gymnasium and outdoor aquatic center; approximately 800,513 square feet of athletic and outdoor educational facilities; and two parking lot facilities.

Table 5.0-3
Reduced Size Campus Project with Acquisition Parcels Alternative Components

Proposed Use	Approximate Square Footage (sf)
Educational/Administrative Facilities	
Academic buildings	191,600
Performing arts center	34,400
Administration Building	14,900
Athletic and Outdoor Educational Facilities	
Gymnasium and aquatic center	79,900
Football stadium, baseball/softball fields, soccer fields, tennis courts, and basketball courts	800,513
Parking Facilities	
North parking lot (173 spaces)	139,610
Main parking lot (75 spaces)	60,000
Total	**1,260,923**

Note: sf = square feet.

The reconstruction of the western portion of the Project Site under this alternative would involve the addition of two softball fields, one soccer field, six tennis courts, and five basketball courts; upgrades to the existing baseball field; the relocation of the football stadium from the southeastern portion of the

12 The CTE is created by Education Code Section 51226. Standards are published by the CDE, https://www.cde.ca.gov/ci/ct/sf/ctemcstandards.asp

campus to the northern portion, adjacent to the baseball field; and the relocation of the existing parking lot farther north of its present location, adjacent to the facilities building.

This alternative would be able to accommodate a total of 2,500 student classroom seats.

Aesthetics

The Reduced Size Campus Project with Acquisition Parcels Alternative would incorporate similar project design features as the Project across the entire 42-acre site, just at a reduced scale. As such, this alternative would result in similar construction and operation-related changes to the visual quality of the Project Site. The buildings across the site under this alternative would maintain the same building heights as those proposed under the Project; thus, views of the surrounding area across the site would be similar when compared to the Project. This alternative would also have similar light and glare impacts, which would be reduced through the incorporation of various design elements and compliance with CBC lighting standards. Therefore, this alternative would have similar less than significant impacts on aesthetics when compared to the Project.

Air Quality

As with the Project, construction of the Reduced Sized Campus Project with Acquisition Parcels Alternative has the potential to create air quality impacts using heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. This alternative would include similar demolition activities as all existing uses on the Project Site would be removed, similar to the Project. However, this alternative would result in less building construction as there would be less square footage of proposed uses when compared to the Project. Impacts of this alternative related to construction air quality would remain less than significant for all criteria pollutants and localized pollutant concentrations during construction and would be reduced when compared to the Project.

In regard to operations, the alternative would emit lower air quality operational emissions compared to the Project as there would be a reduction in total proposed building area. Traffic generated from this alternative would also be similar when compared to the Project since there would be the same proposed student capacity. Accordingly, this alternative would result in similar less than significant impacts with respect to regional criteria pollutant emissions when compared to the Project.

Biological Resources

Under the Reduced Sized Campus Project with Acquisition Parcels Alternative, construction would occur on the entire Project Site, including the existing CHS campus and the acquisition parcels. Similar to the Project, the removal of trees during demolition and site construction could disturb habitat for nesting

birds. Birds as designated by the MBTA, including raptors, or nests or eggs of any bird, except as otherwise provided by the CDFW Code, may not be taken, possessed, or destroyed at any time, therefore the alternative would require the implementation of **Mitigation Measure MM BIO-1**. In addition, this Alternative would also require adherence to Compton Municipal Code Section 20-4 and approval from the City's Public Works Director to reduce impacts related to the removal of designated street trees within the acquisition area. As such, this alternative would result in similar less than significant impacts to biological resources when compared to the Project.

Cultural Resources

The Reduced Sized Campus Project with Acquisition Parcels Alternative would develop the entire 42-acre Project, but the intensity of uses would be at a reduced scale. As this alternative would impact the same development footprint compared to the Project, and thus would have similar potential to uncover previously unknown archeological resources, fossils of paleontological importance, and human remains. As with the Project, the Reduced Sized Campus Project Alternative would implement **Mitigation Measures MM CUL-1, MM CUL-2, MM CUL-3,** and **MM CUL-4** to ensure impacts to cultural resources would be less than significant. In regard to historic resources, this Alternative would not result in the demolition of any buildings or structures that are listed or eligible for listing in either the National Register or the California Register. Thus, this alternative would result in similar less than significant impacts on cultural and historic resources when compared to the Project.

Energy

The overall amount of development under the Reduced Sized Campus Project with Acquisition Parcels Alternative would be similar compared to the Project. Similar to the Project, the Reduced Sized Campus Project Alternative with Acquisition Parcels would be designed in accordance with the 2016 standards of Title 24, California's Energy Efficiency Standards for buildings and the State Energy Conservation Standards. These standards include minimum energy efficiency requirements related to building envelope, mechanical systems (e.g., HVAC and water heating systems), indoor and outdoor lighting, and illuminated signs. This alternative would incorporate similar energy efficiency measures to the Project that would meet State standards and, therefore, would not result in the inefficient, unnecessary, or wasteful use of energy. However, given that this alternative would result in a reduction in total proposed building area, it would lower the amount of energy consumption when compared to the Project. Although the Project would result in less than significant impacts, impacts under this alternative would be reduced when compared to the Project.

Geology and Soils

The Reduced Sized Campus Project with Acquisition Parcels Alternative would have comparable construction activities for the development of the reconstructed CHS campus, including the acquisition parcels. As such, impacts related to the exacerbation of site-specific geologic hazards including seismic fault rupture, strong seismic ground shaking, liquefaction, landside/lateral spreading, seismic-induced settlement, subsidence soil stability, expansive soils and erosion would be similar to those under the Project because such impacts are a function of the site's underlying geologic conditions rather than the intensity of proposed uses. Thus, this alternative's grading and site preparation activities would be similar and would result in similar impacts through compliance with DSA IR-A-24 and incorporation of the recommendations presented in the Geotechnical Report (see **Appendix J** of this Draft EIR). This alternative would also involve the reconstruction of the CHS campus to provide buildings and facilities that meet current CDE and DSA standards and building codes, including those related to structural integrity and seismic safety. This Alternative would result in similar less than significant impacts on geology and soils when compared to the Project.

Greenhouse Gas Emissions

Under the Reduced Sized Campus Project with Acquisition Parcels Alternative, similar construction activities would occur although the intensity of such would be reduced since there would be a reduction in proposed building area. As such, new GHG emissions that would be generated from construction activities would be reduced when compared to the Project. In addition, this alternative would emit less GHG operational emissions compared to the Project based on reduced building area. Daily trips associated with this alternative, upon which the calculations of GHG emissions are mainly based, would be similar to that of the Project as there would be the same proposed student capacity. Impacts under this alternative would be reduced when compared to the Project.

Hazards and Hazardous Materials

Under the Reduced Sized Campus Project with Acquisition Parcels Alternative, there would be potential to create upset or accident conditions involving the release of hazardous materials into the environment during either construction or operation. For construction activities, similar to the Project, all potentially hazardous materials would be used and stored in compliance with applicable federal, State, and local regulations.

The existing campus is located on a site that is included on a list of hazardous materials pursuant to Government Code 65962.5, which is the Hazardous Waste and Substances (Cortese) List.[13] A review of the Cortese List compiled on the DTSC, the SWRCB, and CalEPA conducted as part of the Phase I ESA notes that the Project Site is on the CA HAZNET database. The site is listed for hazardous waste storage and transfer, and for asbestos-containing waste. However, similar to the Project, the alternative would not release subsurface hazardous substances to the environment or expose future occupants or site users to hazardous materials. In addition, the alternative would include the sites located at 327-329 W. Alondra Boulevard for asbestos-containing waste, 339 W. Alondra Boulevard for industrial waste discharge, and 341 W. Alondra Boulevard for a gas station. Prior to construction activities, any structures potentially containing hazardous materials should be inspected. If any potentially hazardous materials are found, removal should be implemented under the DTSC standards. As such, impacts under this alternative would be reduced when compared to the Project.

As part of the environmental review, an Air Toxics Health Risk Assessment (HRA) (see **Appendix D** of this Draft EIR) for the Project has been prepared to address specific requirements of both CDE and CEQA to evaluate whether facilities have the potential for generating hazardous and acutely hazardous air emissions within a quarter-mile (1,320 feet) radius of the Project Site. As noted, the HRA found that the summation of risk totals of 1.1 in 100,000 (1.1E-05) for adults (faculty and staff) exceeds the established threshold of 1 in 100,000 (1.0E-05) for long-term exposure (40 years) for faculty and staff. However, the risk factor for students is calculated to be 8.4 in 10,000,000 (8.4E-07) for a 4-year exposure, which does not exceed the significance threshold of threshold of 1 in 100,000 (1.0E-05). The alternative would have similar results. Therefore, impacts for long-term exposure for faculty and staff would be potentially significant, while impacts to students would be less than significant. As with the Project, the alternative would implement **Mitigation Measure MM HAZ-1** to reduce potentially significant impacts to a less than significant level. As such, impacts under this alternative would be reduced when compared to the Project.

Hydrology and Water Quality

Similar to the Project, the Reduced Sized Campus Project with Acquisition Parcels Alternative would require the construction of new storm-drain systems, including retention basins used to retain the 100-year flood event. As such, construction activities under this Alternative would involve temporary surface water runoff and water quality impacts. Construction of this alternative would require adherence to the State NPDES permit for construction-related activities from the SWRCB. The permit would require the preparation and implementation of a Project-specific SWPPP that indicates which BMPs are intended to reduce erosion, sedimentation, and nonpermitted discharges of materials during construction. Thus, this

13 SWRCB, *GeoTracker*.

alternative would incorporate BMP, such as the incorporation of landscaping features and bioswales, and comply with applicable regulations to ensure that water discharge does not exceed current conditions. Therefore, this alternative would result in similar impacts to hydrology and water quality when compared to the Project.

Land Use and Planning

The Reduced Sized Campus Project with Acquisition Parcels Alternative would develop the CHS campus within the footprint containing the existing campus site and the additional 2 acres south of W. Cocoa Street. Similar to the Project, the District would coordinate with the City to redesignate this acquisition area to reflect the City's land use and zoning designations. The reduction in building area intensity under this alternative would still be consistent with the City's General Plan and Zoning Law requirements, as well as compatible with surrounding uses.

While impacts on land use and planning would be less than significant under the Project, these impacts under this alternative would be reduced when compared to the Project. This alternative would result in similar impacts to land use and planning when compared to the Project.

Noise

Under the Reduced Sized Campus Project with Acquisition Parcels Alternative, construction activities would occur although the intensity of such would be reduced due to the reduce building square footage. As such, the alternative would not eliminate the Project's potentially significant noise impacts during construction and therefore would require the implementation of **Mitigation Measures MM N-1** and **MM N-2** to reduce impacts for nearby sensitive receptors. Similar to the Project, with the implementation of mitigation, impacts under this alternative would be less than significant.

Operational noise would be generated by people using outdoor spaces, vehicles, the PAC and new athletic fields, roadway noise, and building equipment. Similar to the Project, this alternative would result in a negligible increase in operational noise compared to existing conditions based on existing conditions and the number of daily trips to the site. While this alternative would result in a reduction of total building area, the operational uses of the reconstructed CHS campus would be similar to the uses proposed by the Project. This alternative would also include the same proposed student capacity as proposed by the Project. This alternative would result in similar less than significant impacts on construction and operational noise when compared to the Project.

Population and Housing

The Reduced Sized Campus Project with Acquisition Parcels Alternative would not include residential land uses nor would it result in an increase of faculty and staff. As this alternative would not introduce additional employees that would generate new residents, it would result in similar impacts related to population growth when compared to the Project. This alternative, similar to the Project, would acquire the southeastern parcels on the Project Site and demolish all existing uses. As these parcels contain existing residential uses, implementation of the alternative would displace 26 residential units with an associated 110 residents. However, the loss of these units would be absorbed by existing housing stock in the City, and the displacement of these residents would be relocated to available housing prior to start of construction. This alternative would result in similar less than significant impacts on population and housing when compared to the Project.

Transportation and Traffic

The Reduced Sized Campus Project with Acquisition Parcels Alternative would consist of the demolition of all existing uses on the Project Site and the reconstruction of the new CHS campus facilities within the same boundaries of the Project, which includes the acquisition area. This alternative would also include the same proposed student capacity as proposed by the Project and thus, would generate the same number of daily and peak hour trips that would be generated under the Project. Since impacts to all study intersections associated with the Project would be less than significant, the impacts associated with this alternative would also be less than significant. Similar to the Project, this alternative would also be required to reduce potentially significant impacts on parking for after-school and weekend events through implementation of **Mitigation Measure MM TRAF-1**. Therefore, this alternative would result in similar less than significant impacts on transportation and traffic when compared to the Project.

Summary of Impacts

Implementation of the Proposed Project without Acquisition Parcels Alternative would reduce environmental impacts when compared to the proposed Project. As summarized in **Section 4.0** of this Draft EIR, all potentially significant environmental impacts of the proposed Project can be reduced to less than significant levels through adherence to regulatory requirements, incorporation of design features, and the implementation of mitigation measures. Impacts to air quality; biological resources; energy; GHG emissions; and hazards and hazardous materials would be reduced under this alternative when compared to those for the proposed Project. Impacts to aesthetics; biological resources; cultural resources; geology and soils; hydrology and water quality; land use; noise; population and housing; and transportation and traffic would be considered similar under this alternative when compared to those for the proposed Project. A summary of impacts is provided in **Table 5.0-4**.

Relationship to Project Objectives

While potentially significant impacts would be reduced with this Alternative, the following Project objectives would not be achieved with the Reduced Sized Campus Project with Acquisition Parcels Alternative:

- Create a modern, cohesive high school campus that utilizes a state-of-the-art design to support a free-flowing campus with flexible spaces for learning with modern technologies.
- As previously stated, this alternative would not realize the full benefit of a state-of-the-art design intended for the performing arts center. Under this alternative, the smaller performing arts center would not include facilities for the following Performing Arts and Production and Managerial Arts CTE programs: Digital Music Production, Video Production, and TV Production. The following facilities of the CTE program would not be realized under this alternative: production labs and studios, editing rooms, control rooms, sound stage, storage, and related infrastructure space. Accommodate student and faculty needs by providing classrooms and amenities that adequately support Career and Technical Education (CTE) space and programs and Next Generation Learning.

One of the main goals of the District for the future of Compton High School is to implement Next Generation Learning teaching methods. A Next Generation Learning facility involves open, flexible, adaptable, and cohesive spaces that encourage students to "learn anywhere," and provides a variety of comfortable, safe learning environments. However, under this alternative, the smaller performing arts center would not include facilities for the following Performing Arts and Production and Managerial Arts CTE programs: Digital Music Production, Video Production, and TV Production. The following facilities of the CTE program would not be realized under this alternative: production labs and studios, editing rooms, control rooms, sound stage, storage, and related infrastructure space.

- Provide adequate athletic facilities that are capable of hosting effective California Interscholastic Federation (CIF) programs and competitions.

  This objective would not be achieved as would the proposed Project given the reduced number of athletic courts and facilities required to meet that of the CIF requirements. This alternative would provide for only six tennis courts, whereas eight are required under CIF. For an effective CIF venue for soccer, a minimum of two soccer fields are necessary. With only one soccer field, this alternative would not provide an effective CIF venue for soccer. Under the proposed Project the Football stadium, baseball/softball fields, soccer fields, tennis courts, and basketball courts would occupy roughly 1,266,800 sf, whereas this alternative would provide for only 800,513 sf for the same athletic facilities, less than two-thirds that of the proposed project. This reduced footprint would severely constrain the athletic potential of Compton High School.

5.5.4 Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that the analysis of alternatives to a project shall identify an environmentally superior alternative among the alternatives evaluated. The purpose of the

alternatives analysis is to explain potentially feasible ways to avoid or minimize the significant effects identified for the Project. The CEQA Guidelines indicate that if the No Project Alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives.

A summary comparison of impacts associated with the Project alternatives is provided in **Table 5.0-4**. As indicated in **Table 5.0-4**, the first line compares each alternative's incremental increase, decrease, or results in similar impacts, to the Project's identified impact. The second line compares the level of significance of each alternative's impact to the level of significance of the Project's impact. Of the alternatives considered in this Draft EIR section, Alternative 3—Reduced Sized Campus Project with Acquisition Parcels is environmentally superior to the other alternatives because impacts under this alternative would be similar to or less than the Project in more environmental topics.

While the Alternative 2—Proposed Project without Acquisition Parcels Alternative would include the majority of the components proposed by the Project, such components would be reduced under this alternative. The inability to acquire and develop the acquisition area on the southeastern portion of the Project Site would limit the area available to support the level of amenities and support offered by the Project. As such, this alternative would not be as effective in meeting the Project's purpose to create a newly reconstructed CHS campus. Therefore, Alternative 2—Proposed Project without Acquisition Parcels Alternative would not meet the Project's purpose and the objectives.

Table 5.0-4
Comparison of Alternatives to Project

Environmental Issue Area	Project	Alternative 1—No Project	Alternative 2—Proposed Project without Acquisition Parcels	Alternative 3—Reduced Sized Campus Project Alternative with Acquisition Parcels
Aesthetics	Less than Significant	Reduced (No impact)	Similar (Less than Significant)	Similar (Less than Significant)
Air Quality	Less than Significant	Greater (Less than Significant)	Reduced (Less than Significant)	Reduced (Less than Significant)
Biological Resources	Less than Significant with Mitigation	Reduced (No impact)	Reduced (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Cultural Resources	Less than Significant with Mitigation	Reduced (No impact)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)

Environmental Issue Area	Project	Alternative 1—No Project	Alternative 2—Proposed Project without Acquisition Parcels	Alternative 3—Reduced Sized Campus Project Alternative with Acquisition Parcels
Energy	Less than Significant	Greater (Less than Significant)	Similar (Less than Significant)	Reduced (Less than Significant)
Geology and Soils	Less than Significant	Greater (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Greenhouse Gas Emissions	Less than Significant	Greater (Less than Significant)	Reduced (Less than Significant)	Reduced (Less than Significant)
Hazards and Hazardous Materials	Less than Significant with Mitigation	Reduced (No impact)	Reduced (Less than Significant with Mitigation)	Reduced (Less than Significant)
Hydrology and Water Quality	Less than Significant	Similar (Less than Significant)	Greater (Less than Significant)	Similar (Less than Significant)
Land Use and Planning	Less than Significant	Reduced (No Impact)	Reduced (Less than Significant)	Similar (Less than Significant)
Noise	Less than Significant with Mitigation	Reduced (No impact)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Population and Housing	Less than Significant	Reduced (No impact)	Reduced (Less than Significant)	Similar (Less than Significant)
Transportation and Traffic	Less than Significant with Mitigation	Reduced (No impact)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)