

## **VI. ALTERNATIVES**

### **A. INTRODUCTION**

#### **Regulatory Guidelines for Selecting Project Alternatives**

The identification and analysis of alternatives is a fundamental concept under CEQA. The role of alternatives in an EIR is clearly set forth within the CEQA Statutes, California Public Resources Code, Section 21000 et seq. Specifically, Public Resources Code, Section 21002.1 (a) states that:

"The purpose of an environmental impact report is to identify the significant effects of a project on the environment, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided."

California Code of Regulations, Title 14, Chapter 13 (CEQA Guidelines) Section 15126.6, provides some guidance on the formulation of alternatives:

"An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives."

Thus, an EIR for any project subject to CEQA review must consider a reasonable range of alternatives to the project, or to the location of the project, which:

- (1) Offer substantial environmental advantages over the project proposal (Public Resources Code, Section 21002); and
- (2) May be "feasibly accomplished in a successful manner" considering the economic, environmental, social and technological factors involved (Public Resources Code, Section 21061.1).

In determining the nature and scope of alternatives to be examined in an EIR, local agencies are guided by the doctrine of "feasibility." Public Resources Code, Section 21002 states that "it is the policy of the State that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects.... [I]n the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof."

The Legislature has defined "feasible," for purposes of CEQA review, as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (See Public Resources Code, Section 21061.1; CEQA Guidelines, Section 15364.)

The range of alternatives required within an EIR is governed by the "rule of reason" which requires an EIR to set forth only those alternatives necessary to permit a reasoned choice. The CEQA Guidelines direct that the discussion of alternatives shall be limited to those alternatives 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 more costly. Of those alternatives, only the ones that could feasibly attain most of the basic objectives of the project need be examined. While there is no rule for the number of alternatives that must be discussed, the EIR must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation, but need not consider every conceivable alternative to a project. Furthermore, an EIR need not consider an alternative whose implementation is remote and speculative or whose effects cannot be reasonably ascertained.

The CEQA Guidelines provide that the degree of analysis required need not be exhaustive, but rather should be at a level of detail that is reasonably feasible. Under the standards for adequacy, the EIR must contain “a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences.” The analysis of environmental effects of project alternatives need not be as thorough or detailed as the analysis of the project itself. Rather, the CEQA Guidelines state that the EIR shall include “sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.”

Alternative locations should be discussed where any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. The CEQA Guidelines Section 15126.6(f)(2)(A) states that only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion on the EIR.” The Guidelines go on to state that “if the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR.” In addition, alternatives that were considered but were rejected as infeasible during the scoping process should be identified along with a reasonably detailed discussion of the reasons and facts supporting the conclusion that such alternatives were infeasible.

The CEQA Guidelines Section 15126.6(f)(1) provides additional factors that may be taken into account when addressing the feasibility of alternatives. These factors include, “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.”

However, no one factor establishes a fixed limit on the scope of reasonable alternatives. Beyond these factors outlined above, CEQA establishes no categorical legal imperative as to the scope of alternatives to be analyzed in an EIR other than to require analysis of a "No Project" Alternative, which shall discuss the existing conditions at the time the notice of preparation is published, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved...(CEQA Guidelines Section 15126.6(e)(2)). Otherwise, each case must be evaluated on its facts, which in turn must be reviewed in light of the statutory purpose.

Based on the alternatives analysis, an environmentally superior alternative is designated among the alternatives. If the environmentally superior alternative is the No Project Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives.

## B. CRITERIA AND DESCRIPTION OF THE ALTERNATIVES TO BE ANALYZED

### Criteria For Selecting The Alternatives

As stated above, pursuant to CEQA, one of the criteria for defining project alternatives is the potential to attain most of the basic objectives of the Project. As stated in Chapter III. Project Description, the purpose of the West Los Angeles College Facilities Master Plan Projects is to provide for continued and expanded educational opportunities for students. Nine (9) goals and objectives have been identified in the Master Plan as a result of input from the Campus Planning Committee, the Cabinet, and the campus community (i.e., students, faculty and staff). The identified goals are:

**Goal 1:** Create a “State-of-the-Art” physical campus environment that conveys the College’s excellence and stability.

Creating a high quality and attractive physical college environment will promote academic excellence and service in the West Los Angeles College community, region, and the State. “State-of-the-art” facilities, including buildings, classrooms and laboratories, will support a strong academic environment, provide technology opportunities, and encourage other support systems that make WLAC a premier community college.

**Goal 2:** Organize and develop land use activities within the campus to strengthen academic, cultural and social interaction.

Building a lively and stimulating campus environment will encourage learning, personal growth and social interaction. Currently, the majority of academic and student activity facilities at WLAC are scattered in a number of temporary structures on the north side of the campus and along Sophomore Drive. The primary campus buildings are located at the center of the campus, including the Library/Learning Assistance Center, the Fine Arts Complex, Administrative Offices, and the single story Science Building. On the periphery of the central Campus Core are the Physical Education Complex and the Aviation Technology Complex, located on B Street. To reach this goal, land use activities are planned to create a campus that has a recognizable center, appropriate separation of land uses, and desirable spaces such as courtyards and plazas to encourage formal and informal academic, cultural and social interaction.

**Goal 3:** Take advantage of the views from the higher locations of the campus.

One of the greatest assets on the WLAC campus is the view that result from its location in the foothills of the Baldwin Hills. Future development is organized to take advantage of this unique feature, while creating a distinctive and attractive skyline of the campus with the backdrop of the Baldwin Hills when viewed from the west.

**Goal 4:** Create a strong, walkable pedestrian-friendly Campus Core.

Future development will establish and support clear orientation and direction for pedestrians to ensure that they can move safely and efficiently throughout the WLAC campus. Preserving the “human scale” of the campus with active uses at the building edges and clear pedestrian walkways will strengthen the campus’ pedestrian orientation.

**Goal 5:** Preserve, enhance and restore the natural environment.

The Facilities Master Plan organizes new development to efficiently utilize the campus’ limited building opportunities and to ensure that existing trees, wildlife and landscape vegetation in the

core campus is maintained and expanded. Future land use and development patterns will incorporate existing natural landscape patterns to preserve and enhance the environmental quality of the campus and to provide a beautiful, healthy and clean environment for the WLAC community.

**Goal 6:** Strengthen and clarify circulation systems to create a safe, convenient and accessible environment.

The facilities component of the Plan enhances and organizes circulation patterns in and around the WLAC campus to minimize vehicular/pedestrian conflicts and to promote safe, efficient and accessible movement of people, vehicles and services. Access improvements, entryway enhancements, and coordinated vehicular, bicycle, and pedestrian circulation patterns are all a part of the Facilities Master Plan for the WLAC campus. All buildings will be universally accessible.

**Goal 7:** Maintain flexibility in use of spaces and buildings; design for future growth and expansion.

Changing circumstances may affect campus development in the future. It is essential to develop and maintain a land use plan and building design that support the campus today and into the future. Creating flexible facilities that accommodate the College and departmental expansion, clustering appropriate buildings and uses, and providing reserve and expansion areas, will ensure that current and future growth is efficient and desirable in meeting the academic needs of the College.

**Goal 8:** Create a strong sense of place that supports the academic and social life of the College.

The image of WLAC within the campus and community is comprised of many visual design elements, significant buildings and places. These elements are arranged and organized to preserve, enhance and support a strong and unique sense of place, and communicate the WLAC identity to its users and the surrounding community. A beautiful and safe campus with recognizable landmarks, landscape and architectural amenities contribute to this identity. Design elements such as clear attractive campus entries and well-defined edges and entry points will also contribute to a strong sense of place.

**Goal 9:** Strengthen physical connections and campus activities that serve the surrounding community.

WLAC seeks to provide a physical setting that allows the College to exist in harmony with the surrounding community. The campus serves the local community and region by becoming a center of intellectual and cultural life, with facilities and programs that support this goal.

In addition to the requirement regarding an alternative's ability to attain project objectives, a primary consideration in defining an alternative is the potential to reduce or eliminate significant impacts compared to the proposed Project. The impact analysis, as detailed in Section V of this EIR, concluded that the proposed project would generate impacts that would remain significant after mitigation, to traffic, land use (only with regard to the Alternative A second access route), aesthetics (lighting), air quality (construction). Additionally, the proposed project would result in significant cumulative impacts to police, fire, solid waste, air quality (operation), and traffic.

### **Alternatives Considered but Rejected**

**Alternate Sites.** The CEQA Guidelines state that an EIR must "[d]escribe a range of reasonable alternatives to the project, *or to the location of the project*, which could feasibly attain the basic objectives of the project, and evaluate the comparative merits of the alternatives." (CEQA Guidelines, Section 15126.6(a), *italics added*.) As the italicized language suggests, Project alternatives typically fall into one of two categories: on-site alternatives, which generally

consist of different uses of the land under consideration; and off-site alternatives, which usually involve similar uses at different locations.

The purpose proposed project is to accommodate demand for post-secondary education at the WLAC campus. Thus no other sites were considered. The College has one satellite location (at LAX). However, the thrust of the entire project is to expand the WLAC campus to accommodate already anticipated growth.

**Substantially Increased Distance Learning.** The College currently utilizes distance learning (remote access via the internet), which reduces trips to and from the campus. An alternative to substantially increase distance learning does not work because distance learning can only meet a small demand of the campus programming, as on-campus in-person instruction is essential to all programs.

**College Uses Plus Housing.** The College has discussed the possibility of housing (primarily for foreign students) on campus, but decided not to pursue this option because it is not part of the current mission statement, goals or needs of the College. From an environmental perspective, the alternative would not necessarily reduce the significant project impacts, and could increase some impacts. Some examples are as follows: The addition of housing would bring some of the staff or users of the College on-site, eliminating their daily commute, but would add other trips from that housing for purposes of shopping, entertainment and other activities. The alternative would also potentially add grade-school age children impacting local schools, generating school impacts greater than the project's. Also, new noise impacts could occur from on-site residential uses, in terms of night-time automobile trips, possible private parties held in student housing, and activities in the residents' yards, etc.

**Total Build-out.** During the FMP design process, the entire build-out of the Campus was explored, as a "Phase III". This speculative "alternative" was eventually dropped from the project, after further consideration. Given the funds available at the time of the FMP preparation and foreseen by the College for the future, Phase I and II were deemed sufficient for planning purposes until the plan horizon year of 2022.

**Alternate Site Plan.** The previous Facilities Master Plan EIR evaluated the "swapping" of location for various uses proposed for the campus, as these locations had been at issue in selecting the appropriate site plan. In the case of the currently proposed Facilities Master Plan, the uses were placed in optimal locations from the standpoint of the goals and purposes of the Master Plan. Since some of the earlier Facilities Master Plan uses had already been implemented, fewer choices were possible or necessary. Nevertheless, at least one NOP-phase comment asked if the Ice Rinks could instead be located where the Throwing Field is located. The location of these two uses cannot be switched, due to the different size requirements. The Throwing Field location is not large enough for the Ice Rink and associated parking. In addition, Ice Rink activities could generate more traffic than the Throwing Field. Being indoors, the Ice Rink activities could occur in all weather conditions as well as at night. Therefore, increased additional noise (including occasional nighttime noise) would be generated as compared to the project. Cars traveling uphill on Stocker Street at night towards the Throwing Field location would add more noise over a greater distance than those going to the planned location. Another alternation to the site plan that was considered was to move the football field in such a way as to avoid the lighting impacts from the proposed Phase II bleacher seats and lighting project. Although further study would be needed to confirm it, it appears possible to switch the location of the other ball fields with the football field. With the revised location, the lights would be lined up in an east-west direction, presumably with somewhat less impact along Freshman due to the distance from the furthest light to the street. However both field locations are on Freshman Drive, with the same proximity to residential uses, thus not much would be gained. Turning the bleachers would reduce the project's adverse but less than significant visual impact, and would block less of the view from the west, along Freshman Drive towards the Baldwin Hills. This configuration would require relocation of the bio-swale (a feature with beneficial impact in terms of hydrology and water quality, biological resources and aesthetics), and given the few benefits the alternate configuration would provide, it does not make sense to implement it instead of the proposed project. There is no other location of sufficient size and topography to accommodate the field elsewhere.

### Alternatives for the Second Access Road

Three potential routes for the second access road have been considered, although neither the LACCD nor WLAC has committed to the acquisition of any property for any particular roadway alignment. Because the roadway is listed as a Phase II project, the alternative alignments are discussed, where impacts would occur, within each individual environmental analysis section (Section V). Thus, no additional analysis of the roadways alternatives is necessary in this Alternatives Section.

### Alternatives Chosen for Evaluation

The following alternatives were selected for evaluation and comparison to the project:

**1. No Project/Existing Conditions Alternative.** The first alternative assumes that no changes to the campus occur. The existing structures, including classroom, sports facilities, and parking lots would remain in their current condition. The student enrollment would remain at 9,287 (6,436 FTE), the employee count would remain at 516 (334 FTE), and a total of 419,315 sf of building space would remain. This building space would continue to consist of 325,078 sf within permanent structures and 94,237 sf in temporary structures, as shown in **Table VI-1**, below (see **Table III-1** in the Project Description Section for individual existing campus facilities space allocation). This alternative is another traditional version of the No Project Alternative. It satisfies the purpose of allowing decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project (CEQA Guidelines Section 15126.6 (e) 1).

**Table VI-1**  
**Alternatives Development Summary**

Alternative	Existing (gross square feet)	Net New (gross square feet)	Total (gross square feet)
1. No Project	419,315	0	419,315
2. Prev. Facil. Master Plan	419,315	103,012	522,327
3. Phase I Only	419,315	196,528	615,843

**2. No Project/Previous Facilities Master Plan Alternative.** This alternative demonstrates what would occur if development follows the Previous WLAC Facilities Master Plan (PFMP), adopted in 1989. This alternative satisfies CEQA ((Guideline Section 15126.6 (e) 2)) in providing an alternative that focuses on what would be reasonably expected to occur in the foreseeable future, based on current plans, if the project were not approved. Under the PFMP, five phases or stages of development were described, which would have resulted in a total of 522,327 sf of development on the campus. Existing development on Campus at the time (1989) was considered Stage I (286,715 sf of development existed at the time - calculated by a process of deduction). Stage II and III have since been constructed, and part of Stage IV, the Child Development Center is now under construction, and considered built for the purposes of this EIR (see Project Description, Section III). Stage IV was also to include a second floor addition to the Science Building and an outdoor amphitheater, neither of which has been built. Stage V was to consist of relocation of the Campus Police offices and the construction of an indoor swimming pool. The previous PFMP development for Stages II through IV, would have allowed 235,612 sf (excluding the parking structure square footage and relocation square footage), as shown in **Table VI-2**, below. The net new development proposed at the time was 235,612 sf; however, given current existing conditions (see Table VI-2), the net new development would be 103,012 sf.

**Table VI-2**  
**Previous (1989) Facilities Master Plan (PFMP)**

Stage/Project	Size (gross square feet)	Current Status
<b>Stage II</b>		
Aerospace Complex	60,000 sf	Built
Physical Education Bldg.	25,000 sf	Built
Plant Facilities Move	(assume no net change)	Un-built
<b>Stage II total:</b>	<b>85,000 sf</b>	
<b>Stage III</b>		
Fine Arts Complex	45,800 sf	Built
Campus Center	(unknown)	Un-built
<b>Stage III total:</b>	<b>45,800 sf</b>	
<b>Stage IV</b>		
Science Building Second Floor Addition	15,000 sf	Un-built
Outdoor Amphitheater	7,500 sf	Un-built
Child Development Center	1,800 sf	Built <sup>(a)</sup>
<b>Stage IV total:</b>	<b>24,300 sf</b>	
<b>Stage V</b>		
New Science Building (now called Science and Math Building)	(size not specified) assumed same as project at 65,512 sf	Un-built
Parking Structure on Lot 8	(size not specified) but smaller than project's 374,000 sf and 1,000 spaces	Un-built
Relocate Campus Police	(move 132,000 sf; assume no net change)	Un-built
Indoor Swimming Pool	(size not specified) assumed at 15,000 sf	Un-built
<b>Stage V total:</b>	<b>80,512 sf</b> <b>(not including parking)</b>	
<b>Total PFMP</b>	<b>235,612 sf</b> <b>(not including parking or relocated uses)</b>	
Source: WLAC Facilities Master Plan, MIG, April 2003, page II-6 and Letter from Frank Quiambao, President of WLAC to Mike Thomson, Chief Executive Officer of Culver City, March 25, 2003.		
<sup>(a)</sup> Will be complete by start date of proposed FMP projects; considered built in Project Description, Section III of this EIR.		

This alternative includes less development than the proposed project, particularly considering that the PFMP had an earlier build-out date of 1998, and there was less already built on the site (note that despite the passing of the build-out date, not all the buildings were constructed, as shown in Table VI-2). The PFMP Alternative would result in a total of 15,000 students (9,524 FTE).<sup>1</sup>

**3. Phase I Only Alternative.** The third alternative consists of a Phase I of the currently proposed FMP, excluding Phase II and the second access road. The development associated with Phase I is outlined in **Table II-2** of the Project Description. As shown, a total of 615,843 gross sf of campus structures would be developed by the end of Phase II, which is 196,528 sf over the existing conditions total of 419,315. In addition, a parking structure on Lot 8 (to accommodate 1,000 automobile spaces) and sports fields would be constructed (not included in the total square footage for structures). The Phase I Only Alternative would result in a total of 15,124 students (12,843 FTE) and 953 employees (622 FTE).

The impacts of the alternatives are compared to the project impacts for each individual environmental issue in **Table VI-3**, below, and in the sub-sections that follow.

<sup>1</sup> Student projections for PFMP are from the Final EIR for that Plan, Bolling Gill Allen McDonald Architects for the LACCD, April, 1989, Table 10, Page 42. No employee projections are given.

**Table VI-3**  
**Alternatives Impact Comparison Summary**

<b>Environmental Issue</b>	<b>Project Impact</b>	<b>Alt. 1 No Project/ Existing Conditions</b>	<b>Alt. 2 No Project/ PFMP</b>	<b>Alt. 3 Phase I Only</b>
a. Aesthetics 1. Visual Character and Scenic Views	Less Than Significant After Mitigation	Reduced	Reduced	Reduced
2. Light and Glare	<i>Significant After Mitigation</i>	<i>Reduced*</i>	<i>Reduced*</i>	<i>Reduced*</i>
b. Air Quality	<i>Significant After Mitigation</i>	<i>Reduced</i>	<i>Reduced</i>	<i>Reduced</i>
c. Biological Resources	Less Than Significant After Mitigation	Reduced	Reduced	Reduced
d. Cultural Resources	Less Than Significant After Mitigation	Reduced	Reduced	Reduced
e. Geology and Soils	Less Than Significant After Mitigation	Reduced	Reduced	Reduced
f. Hazards	Less Than Significant After Mitigation	Increased	Same	Same
g. Hydrology and Water Quality	Less Than Significant After Mitigation	Reduced	Reduced	Reduced
h. Land Use	<i>Significant After Mitigation (only for Second Access Road Alternative A)</i>	<i>Reduced*</i>	<i>Reduced*</i>	<i>Reduced*</i>
i. Mineral Resources	No Impact	Same	Same	Same
j. Noise	Less than Significant	Reduced	Reduced	Reduced
k. Public Services 1. Fire Services	<i>Significant After Mitigation (for response times to campus)</i>	<i>Reduced*</i>	<i>Reduced</i>	<i>Reduced</i>
2. Police Services	<i>Significant After Mitigation (for response times off-campus)</i>	<i>Reduced*</i>	<i>Reduced</i>	<i>Reduced</i>
3. Schools	Less Than Significant	Reduced	Reduced	Reduced
4. Libraries	Less Than Significant	Reduced	Reduced	Reduced
l. Recreation and Parks	Less Than Significant	Similar (on balance)	Increased (on balance)	Increased (on balance)
m. Traffic	Significant After Mitigation	Reduced	Reduced	Reduced
n. Utilities and Service Systems 1. Wastewater	Less Than Significant Impact	Reduced	Reduced	Reduced
2. Stormwater	Less Than Significant Impact	Reduced	Reduced	Reduced
3. Water Supply	Less Than Significant Impact	Reduced	Reduced	Reduced
4. Solid Waste	Less Than Significant Impact**	Reduced	Reduced	Reduced
5. Electricity	Less Than Significant Impact	Reduced	Reduced	Reduced
<b>Conclusion:</b>		<b>Lowest Impact of Alts</b>	<b>Second Lowest Impact</b>	<b>Third Lowest Impact</b>
* Impacts would be reduced and alternative would also result in the elimination of a significant unavoidable impact (or potentially unavoidable significant impact).				
** Cumulative impacts are significant for this issue; all alternatives would have a reduced contribution as compared to the project.				

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**C. ANALYSIS OF ALTERNATIVE 1: NO PROJECT/EXISTING CONDITIONS ALTERNATIVE****a. Aesthetics**

**1. Visual Character and Scenic Views.** The No Project/Existing Conditions Alternative would create no impacts beyond current conditions. No new buildings or facilities would be constructed, and thus the adverse impact of the bleachers near Freshman Drive would not occur. The impact would be less than with the proposed project.

**2. Light and Glare.** Existing conditions would remain, and no additional lighting would be added; thus, impacts would be reduced.

**b. Air Quality.** No additional sources of air pollutant emissions would be added; thus impacts would be reduced.

**c. Biological Resources.** No changes from existing conditions would occur. The impact would be reduced.

**d. Cultural Resources.** No areas of the campus would be disturbed, thus no cultural resources (archaeological or paleontological) impacts would occur. The potential impact would be less.

**e. Geology and Soils.** Since the campus would not be graded and no new development would occur, no impacts would occur.

**f. Hazards.** Potential impacts with regard to oil, asbestos, lead-based paint and other hazardous materials were evaluated. The potential impacts with regard to asbestos containing materials (ACMs) are a concern. Although only small quantities of ACMs exist on site, abatement activities should be undertaken in accordance with legal procedures. Abatement of the ACM would reduce impacts to a less than significant level. While both the proposed Project and the No Project Alternative impact would ultimately not result in significant impacts, overall the impact of the proposed Project would be better because it would force the abatement of the ACMs. Additionally, removal of the older buildings and replacement with new structures using current building materials and techniques would alleviate any potential impacts on hazards and hazardous materials.

**g. Hydrology and Water Quality.** No areas of the campus would be graded, and existing drainage patterns would not be modified. No measures to increase retention of water on-site or to improve the quality of runoff water or to increase groundwater recharge would occur. Nevertheless, due to the fact that no change would occur, the impact is considered reduced.

**h. Land Use.** No development would occur; thus impacts would be reduced.

**i. Mineral Resources.** No development or impact would occur. Since the project would also have no impact, the impact is the same.

**j. Noise.** No increase in noise or addition of new noise sources would occur. Impacts would be reduced.

**k. Public Services (Fire Services, Police Services, Schools, Libraries).** No development would occur. Thus, the demand for Fire Services, Police Services, Schools and Libraries would remain unchanged from current conditions. Impacts to all of these public services would be reduced. (Current Fire Department response times to the site and Police response times off-campus in the area would remain high, but not be increased.)

**l. Recreation and Parks.** No increase in students or employees would occur. Also, none of the project components, including the recreational components would be constructed. Impacts to off-site parks would be reduced, but the recreational improvements to the campus that would benefit the community would not occur either. Thus impacts balance out to be about the same.

**m. Traffic.** No new Campus trips would be added to area roadways. Existing congestion at area intersections and roadways would continue, but the alternative impacts would be reduced over the project's.

**n. Utilities and Service Systems (*Wastewater, Stormwater, Water Supply, Solid Waste and Electricity*).** No new development would occur; thus, no increase in demand for Wastewater, Stormwater, Water Supply, Solid Waste or Electricity service systems would occur. Impacts would be reduced.

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**D. ANALYSIS OF ALTERNATIVE 2: NO PROJECT/PREVIOUS FACILITIES MASTER PLAN****a. Aesthetics**

**1. Visual Character and Scenic Views.** The No Project/PFMP Alternative would include fewer buildings and structures, and thus have fewer view-obstruction potential. Development would not include the bleachers, thus, the adverse but less than significant impact of the bleachers near Freshman Drive would not occur. The impact would be less than with the proposed project.

**2. Light and Glare.** Less construction would occur (and lighting for the sports facilities on the west side of campus would not occur), and therefore less lighting would be added. Impacts would be reduced, and one of the project's significant unavoidable impacts would be eliminated (night lighting of sports fields on west side of campus).

**b. Air Quality.** Less development would occur. Construction impacts would be reduced, but could remain significant. Fewer vehicle trips would be added, reducing the amount of project-related air pollutant emissions. Impacts would be reduced.

**c. Biological Resources.** Less development would occur, and potentially significant impacts along the alignment of the second access road (whichever of the three that is developed) would not occur. The impact would be reduced.

**d. Cultural Resources.** Less of the campus land area would be disturbed, thus there is less of a chance of finding cultural resources (archaeological or paleontological). The potentially more archaeologically and paleontologically sensitive areas along the alignment of the second access road (whichever of the three that is developed) would be eliminated. The potential impact would be less.

**e. Geology and Soils.** Because fewer structures are proposed, impacts would be reduced (although mitigation similar to the project's mitigation would be required for any buildings that would be built).

**f. Hazards.** In the context of hazardous and hazardous materials, development of the previous Facilities Master Plan would be similar to the proposed Project. The potential impacts with regard to ACMs are a concern due to the demolition and construction of the proposed Project. It is assumed that the alternative would incorporate mitigation measures designed to reduce impacts to less than significant levels. Overall both scenarios would result in less than significant impacts after mitigation.

**g. Hydrology and Water Quality.** Fewer areas of the campus would be modified. Similar measures to increase retention of water on-site, to improve the quality of runoff water, and to increase groundwater recharge would occur. Nevertheless, due to the fact that less development would occur, the impact is considered reduced.

**h. Land Use.** Less development would occur; thus, impacts would be reduced. The second access road would not be constructed, and thus second access road Alternative A's potentially significant impacts would definitely not occur.

**i. Mineral Resources.** Less development would be completed, but no impact to mineral resources would occur. Since the project would also have no impact, the impact is the same.

**j. Noise.** Fewer vehicle trips would be added, and fewer outdoor sports events would occur. Ice Rink events would be eliminated, but the indoor swimming pool would substitute for some of these trips (less trips than a two-sheet Ice Rink). Noise impacts would be reduced.

**k. Public Services.** Less development would occur. Thus, the demand and impacts for Fire Services, Police Services, Schools and Libraries would be reduced. Nevertheless, since significant traffic impacts would occur even with this alternative, the significant unavoidable impacts with regard to fire service response times (to the campus) and police service response times (off-campus) would remain, but be reduced.

**l. Recreation and Parks.** A reduced increase in students and employees would occur. Fewer recreational components would be constructed; an indoor swimming pool would be constructed instead of the Football Field improvements, Throwing Field and two-sheet Ice Rink. Impacts to off-site parks would be reduced, and recreational improvements to the campus that would benefit the community would also be reduced. Thus impacts would be increased.

**m. Traffic.** Less Development would occur; thus, fewer traffic impacts would occur. The PFMP EIR showed no significant impacts; however, that analysis was prepared in 1989, when the area roadways were less congested. Analysis of the same project today would indicate significant impacts, but at fewer intersections than the project. Impacts would be reduced.

**n. Utilities and Service Systems (*Wastewater, Stormwater, Water Supply, Solid Waste and Electricity*).** Less development would occur; thus, no a reduced demand for Wastewater, Stormwater, Water Supply, Solid Waste or Electricity service systems would occur. Impacts would be reduced.

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**E. ANALYSIS OF ALTERNATIVE 3: PHASE I ONLY****a. Aesthetics**

**1. Visual Character and Scenic Views.** The Phase I Only Alternative would include fewer buildings and structures, and thus have fewer view-obstruction potential. Development would not include the bleachers, thus, the adverse but less than significant impact of the bleachers near Freshman Drive would not occur. The impact would be less than with the proposed project.

**2. Light and Glare.** Less construction would occur (and lighting for the sports facilities on the west side of campus would not occur), and therefore less lighting would be added. Impacts would be reduced, and one of the project's significant unavoidable impacts would be eliminated (night lighting of sports fields on west side of campus).

**b. Air Quality.** Less development would occur. Construction impacts would be reduced, but could remain significant. Fewer vehicle trips would be added, reducing the amount of project-related air pollutant emissions. Impacts would be reduced.

**c. Biological Resources.** Less development would occur, and potentially significant impacts along the alignment of the second access road (whichever of the three that is developed) would not occur. The impact would be reduced.

**d. Cultural Resources.** Less of the campus land area would be disturbed, thus there is less of a chance of finding cultural resources (archaeological or paleontological). The potentially more archaeologically and paleontologically sensitive areas along the alignment of the second access road (whichever of the three that is developed) would be eliminated. The potential impact would be less.

**e. Geology and Soils.** Because fewer structures are proposed, impacts would be reduced (although mitigation similar to the project's mitigation would be required for any buildings that would be built).

**f. Hazards.** Development of only Phase I of the proposed Project would have a similar impact on hazards and hazardous materials. The potential impacts with regard to ACMs are a concern due to the demolition and construction of the proposed Project. It is assumed that the alternative would incorporate mitigation measures designed to reduce impacts to less than significant levels. Although, alternative three would impact fewer existing structures, the removal of buildings in Phase II of the proposed Project would replace additional existing buildings that could have ACMs or lead-based paint. Overall both scenarios would result in less than significant impacts after mitigation.

**g. Hydrology and Water Quality.** Fewer areas of the campus would be modified. Similar measures to increase retention of water on-site, to improve the quality of runoff water, and to increase groundwater recharge would occur. Nevertheless, due to the fact that less development would occur, the impact is considered reduced.

**h. Land Use.** Less development would occur; thus, impacts would be reduced. The second access road would not be constructed, and thus second access road Alternative A's potentially significant impacts would definitely not occur.

**i. Mineral Resources.** Less development would be completed, but no impact to mineral resources would occur. Since the project would also have no impact, the impact is the same.

**k. Noise.** Fewer vehicle trips would be added, and fewer outdoor sports events would occur. Ice Rink events would be eliminated. Noise impacts would be reduced.

**k. Public Services.** Less development would occur. Thus, the demand and impacts for Fire Services, Police Services, Schools and Libraries would be reduced. Nevertheless, since significant traffic impacts would occur even with this alternative, the significant unavoidable impacts with regard to fire service response times (to the campus) and police service response times (off-campus) would remain, but be reduced.

**l. Recreation and Parks.** A reduced increase in students and employees would occur. No recreational components would be constructed. Impacts to off-site parks would be reduced, but recreational improvements to the campus that would benefit the community would also be reduced. Thus impacts would be increased.

**m. Traffic.** Less development would occur; thus, fewer traffic impacts would occur (see Section V.M, Traffic).

**n. Utilities and Service Systems (*Wastewater, Stormwater, Water Supply, Solid Waste and Electricity*).** Less development would occur; thus, no a reduced demand for Wastewater, Stormwater, Water Supply, Solid Waste or Electricity service systems would occur. Impacts would be reduced.

**F. ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

As required by the California Environmental Quality Act (CEQA), an environmentally superior alternative must be identified. In this case, all the alternatives would have lessened impacts over the project. The alternatives with the least environmental impacts would be the No Project/Existing Conditions Alternative, followed by the No Project/PFMP Alternative, followed by the Phase I Only Alternative, as shown in Table VI-3, above.

The project was selected over the alternatives due to the need to serve additional demand for post-secondary education in the LACCD area, and at WLAC in particular. The goals of the project for the 2022 Master Plan (stated in the Project Description, and in the introductory portion of this Alternatives Section), would not be met with the No Project/Existing Conditions Alternative, and would be met to an unsatisfactory degree with the No Project/PFMP Alternative, and the Phase I Only Alternative.

Given its significant unavoidable impacts, the proposed project will require a Statement of Overriding Considerations under CEQA. To adopt a Statement of Overriding Considerations, the LACCD must determine that there are overriding benefits to the project that outweigh the significant impacts. The primary benefit and objective of the project is the provision of educational opportunities, which is an objective of high importance on the local, state and federal government level. None of the alternatives go as far as the project in meeting this primary benefit.