IV. Environmental Impact Analysis

J. Public Services

3. Schools

1. Introduction

This section evaluates whether new or physically altered school facilities would be required to provide school services to the Project, the construction of which could cause significant environmental impacts. The analysis estimates the number of students that would be generated by the Project based on Los Angeles Unified School District (LAUSD) student generation rates and addresses whether LAUSD school facilities would have sufficient capacity to accommodate these students. The analysis discusses state-required developer mitigation fees and addresses all levels of educational facilities operated by LAUSD (i.e., elementary, middle, and high schools). The analysis is based, in part, on written correspondence with LAUSD, which is included in **Appendix K**, of this Draft EIR.

2. Environmental Setting

a) Regulatory Framework

There are several plans, policies, and programs regarding Schools at the state, regional, and local levels. Described below, these include:

- California Education Code
- Senate Bill 50
- Open Enrollment Policy (Cal. Educ. Code Sections 48350, et seq.)
- Class Size Reduction Kindergarten-University Public Education Facilities Bond Act of 1998
- LAUSD Strategic Plan 2016–2019
- City of Los Angeles General Plan, including:
    - Framework Element
    - Central City North Community Plan

(1) State

(a) California Education Code

Educational services and school facilities for the Project are subject to the rules and regulations of the California Education Code, the California Department of Education (CDE) and governance of the State Board of Education (SBE) (Gov. Code Section 33000, et seq.). The CDE is the

government agency responsible for public education throughout the state. With the State Superintendent of Public Instruction, the CDE is responsible for enforcing education law and regulations and for continuing to reform and improve public elementary school, secondary school, childcare programs, adult education, and preschool programs. The CDE oversees funding, and student testing and achievement levels for all state schools. A sector of the CDE, the SBE is the 11-member governing and policymaking body of the CDE that sets Kindergarten through 12th Grade (K–12) education policy in the areas of standards, instructional materials, assessment, and accountability. The State also provides funding through a combination of sales and income taxes. In addition, pursuant to Proposition 98, the State is also responsible for the allocation of educational funds that are acquired from property taxes. Further, the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities.[1]

(b) Senate Bill 50

The Leroy F. Greene School Facilities Act of 1998 (known as the Greene Act), enacted in 1998, is a program for funding school facilities largely based on matching funds. For new school construction, grants provide funding on a 50/50 State and local match basis. For school modernization, grants provide funding on a 60/40 State and local match basis. Districts that are unable to provide some, or all, of the local match requirement and are able to meet the financial hardship provisions may be eligible for additional State funding.[2]

The Greene Act permits the local district to levy a fee, charge, dedication, or other requirement against any development project within its boundaries, for the purpose of funding the construction or reconstruction of school facilities. The Act also sets a maximum level of fees a developer may be required to pay. Pursuant to Government Code Section 65996, the payment of these fees by a developer serves to mitigate all potential impacts on school facilities that may result from implementation of a project to a less-than-significant level.[3]

(c) Open Enrollment Policy

The Open Enrollment Policy (Cal. Educ. Code Sections 48350, et seq.) is a state-mandated policy that enables students located in the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated “open enrollment” seats. Open enrollment seats are granted through an application process that is completed before the school year begins. Under the Open Enrollment Policy, students living in a particular school’s attendance area are not displaced by a student requesting an open enrollment transfer to that school.[4]

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1 California Education Code Section 17620(a)(1), https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=EDC&sectionNum=17620. Accessed August 22, 2022.

2 State of California, Office of Public School Construction, School Facility Program Guide, October 24, 2012, file:///Users/jenniferjohnson/Downloads/SFP_Hdbk_ADA-1.pdf Accessed August 22, 2022.

3 California Government Code Section 65996, https://codes.findlaw.com/ca/government-code/gov-sect-65996.html. Accessed August 22, 2022.

4 News Release, Los Angeles Unified School District, Office of Communications, April 17, 2000.

(d) Class Size Reduction Kindergarten-University Public Education Facilities Bond Act of 1998

Proposition 1A, the Class Size Reduction Kindergarten-University Public Education Facilities Bond Act of 1998 (Ed. Code, Section 100400–100405) is a school construction funding measure that was approved by the voters on the November 3, 1998 ballot. This Act created the School Facility Program where eligible school districts may obtain state bond funds.

(2) Regional

(a) Los Angeles Unified School District

As indicated above, the State is primarily responsible for the funding and structure of the local school districts, and in this case, LAUSD. As LAUSD provides education to students in many cities and county areas, in addition to the City, its oversight is largely a district-level issue. Public schools operate under the policy direction of elected governing district school boards (elected from the local area) as well as by local propositions which directly impact the funding of facility construction and maintenance. Pursuant to the Greene Act, LAUSD collects developer fees for new construction within its boundaries. The LAUSD School Facilities Needs Analysis has been prepared to support the school district's levy of the fees authorized by Section 17620 of the California Education Code. Payment of these fees would be mandatory for the Project , and would fully mitigate any impact upon school services generated by the Project.[5]

(i) LAUSD Strategic Plan 2016-2019

The LAUSD Strategic Plan 2016–2019 (Strategic Plan) represents the LAUSD's framework towards a commitment to 100 percent graduation. In following the Strategic Plan's fundamental strategy, the LAUSD will direct its efforts and resources to recruit, develop, and support principals and teachers in creating a learning environment that ensures 100 percent of students achieve and graduate. The Strategic Plan identified five main objectives: (1) Build a Solid Foundation for Early Learners; (2) Proficiency for All; (3) 100 Percent Attendance; (4) Parent, Community, and Student Engagement; (5) School Safety. Furthermore, the Strategic Plan provides key initiatives to achieve these commitments from which implementation plans will be created. Plans will be structured to include specific action steps, responsibilities, and timelines. As such, the LAUSD will be able to monitor and measure progress and provide accountability during the Strategic Plan's implementation process.

(ii) LAUSD Choices Program

LAUSD provides education choices including magnet and permits with transportation (PWT) programs to students residing within the LAUSD boundaries. Students interested in enrolling in

[5] Los Angeles Unified School District, 2020 Developer Justification Study, March, 2020, https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/921/LAUSD%20Dev%20Fee%20Study%202020_Final.pdf. Accessed August 22, 2022.

LAUSD magnet and PWT programs are required to apply through LAUSD eChoices. Magnet schools under the Choice Program include business, communication arts, center for enriched studies, gifted/highly gifted/high ability, liberal arts, magnet schools assistance program, public service, science/technology/engineering/math, and visual and performing arts.[6]

(3) Local

(a) Los Angeles General Plan

(i) Framework Element

Chapter 9, Infrastructure and Public Services of the Framework Element includes goals, objectives, and policies applicable to public schools; these are summarized in **Table IV.J.3-1, Relevant General Plan School Goals, Objectives, and Policies.**

Table IV.J.3-1
Relevant General Plan School Goals, Objectives, and Policies

Framework Element – Chapter 9 Infrastructure and Public Services	
Goal 9N	Public schools that provide a quality education for all of the City's children, including those with special needs, and adequate school facilities to serve every neighborhood in the City so that students have an opportunity to attend school in their neighborhoods.
Objective 9.31	Work constructively with the Los Angeles Unified School District to monitor and forecast school service demand based upon actual and predicted growth.
Policy 9.31.1	Participate in the development of, and share demographic information about, population estimates.
Objective 9.32	Work constructively with Los Angeles Unified School District to promote the siting and construction of adequate school facilities phased with growth.
Policy 9.32.1	Work with the Los Angeles Unified School District to ensure that school facilities and programs are expanded commensurate with the City's population growth and development.
Policy 9.32.2	Explore creative alternatives for providing new school sites in the City, where appropriate.
Policy 9.32.3	Work with LAUSD to explore incentives and funding mechanisms to provide school facilities in areas where there is a deficiency in classroom seats.
Objective 9.33	Maximize the use of local schools for community use and local open space and parks for school use.
Policy 9.33.1	Encourage a program of decision-making at the local school level to provide access to school facilities by neighborhood organizations.
Policy 9.33.2	Develop a strategy to site community facilities (libraries, parks, schools, and auditoriums) together.
Source: City of Los Angeles 2001.	

(b) Central City North Community Plan

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for

[6] LAUD, e-Choices LAUSD Choices Program, https://echoices.lausd.net/, Accessed August 22, 2022.

the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City's General Plan Framework at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to schools required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities.

The Central City North Community Plan, which covers the Project Site, contains the following school-related goal, objective and policy applicable to the Project:[7]

Objective 6-1: Site schools in locations complementary to existing land uses, recreational opportunities and community identity.

Policy 6-1.1: Encourage compatibility in school locations, site layout and architectural design with adjacent land uses and community character and, as appropriate, use schools to create a logical transition and buffer between different uses e.g., multiple family residential versus single family residential.

Policy 6-1.2: Encourage cooperation between the Los Angeles Unified School District, and the Los Angeles County Parks and Recreation Department to provide recreational facilities for the community.

b) Existing Conditions

(1) Los Angeles Unified School District

The LAUSD is the second largest school district in the nation and covers an area totaling 710 square miles. It encompasses most of the City of Los Angeles, along with all or portions of 26 cities and unincorporated areas of Los Angeles County. The estimated student enrollment for 2019-2020 includes approximately 557,560 students in kindergarten through 12th grade and an additional 30,000 students in special education programs and continuation schools for a total of 587,359 students. Additionally, early education and adult education programs enroll approximately 18,988 and 64,527 students respectively.[8] The LAUSD has jurisdiction over 19 primary school centers, 441 elementary schools, 79 middle schools, 92 high schools, 54 option schools, 53 magnet schools, 25 multi-level schools, 13 special education schools, two

[7] City of Los Angeles, Central City North Community Plan, 2000, https://planning.lacity.org/odocument/e06434a6-341a-48ed-97dc-8f6a85780951/Central_City_North_Community_Plan.pdf. Accessed August 22, 2022.

[8] Los Angeles Unified School District, Fingertip Facts 2019-2020, https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/416/Quick%20Links/Fingertip%20Facts%202019-2020.pdf. Accessed August 22, 2022.

home/hospital, 239 K-12 magnet centers (on regular campuses), 228 charter schools and 142 other schools and centers.[9]

The LAUSD is currently divided into six local districts (Northeast, Northwest, East, West, Central, and South); with the Project Site being located in the Local District East.[10] Pursuant to the LAUSD, the Project Site is located within the attendance boundaries of 9th Street Elementary School Hollenbeck Middle School, and within the Boyle Heights Academic Zone of Choice.[11] The Boyle Heights Academic Zone of Choice offers two schools options to residents within this attendance boundary: Theodore Roosevelt High School and Felicitas & Gonzalo Mendez High School. Additionally, Roosevelt High School hosts a by-application magnet center, Roosevelt Math, Science and Technology Magnet Academy. There is an additional school, Metropolitan Continuation High School, with enrollment permitted through referral, which is a high school for students that have fallen behind on credits. These schools currently operate under a single-track calendar. **Figure IV.J.3-l, School Location Map**, shows the location of the public schools in relation to the Project Site.

Table IV.J.3-2, LAUSD Schools Enrollment and Capacity, presents the capacity, enrollment, and seating shortages or overages for each of these schools. All data present in the table already account for portable classrooms on site, additions being built onto existing schools, student permits and transfers, specific educational programs running at the schools, and any other operational activities or educational programming that affects the capacities and enrollments of LAUSD's schools.[12]

Resident enrollment is defined as the total number of students living in the school's attendance area who are eligible to attend the school, including magnet students, and actual enrollment is defined as the number of students actually attending the school currently, including magnet students. Available seating capacity is based on residential enrollment (i.e., the number of students living in a school's attendance area who are eligible to attend the school) compared to the respective school's capacity. The goal of the calculation is to determine the number of seats that are available for students residing within the attendance boundary. LAUSD considers a school to be overcrowded if any one of the following occurs: 1) it currently operates on a multi-track calendar; 2) there is currently a capacity shortage; or 3) there is currently a capacity overage of less than or equal to "safety margin" of 20 seats (e.g., if the available capacity is 20 seats or fewer).

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9 Los Angeles Unified School District, Fingertip Facts 2019-2020, https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/416/Quick%20Links/Fingertip%20Facts%202019-2020.pdf. Accessed August 22, 2022.

10 LAUSD Map, Local District East, https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/33/East.pdf. Accessed August 22, 2022.

11 Written correspondence with Vincent Maffei, School Management Service and Demographics, LAUSD, June 17, 2021, **Appendix K** to this Draft EIR.

12 Written correspondence with Rena Perez, Director of Master Planning & Demographics, LAUSD, July 12, 2017, Written correspondence with Vincent Maffei, School Management Service and Demographics, LAUSD, June 17, 2021, **Appendix K** of this Draft EIR.

Table IV.J.3-2
Existing (2019-2020) LAUSD School Capacity and Enrollment

School Name	Current Capacity[b]	Resident Enrollment[c]	Actual Enrollment[d]	Current Seating Overage/ (Shortage)[e]	Overcrowded[f]
9th Street Elementary School (K-5)	340	286	314	54	No
Hollenbeck Middle School (6-8)	1,125	1,640	1,134	**(515)**	Yes
School Choice Area Totals[a] Boyle Heights Academic Zone of Choice	2,544	3,374	2,348	**(830)**	Yes
Roosevelt Senior High School	1,466	-	1,341	-	-
Mendez Senior High School	1,078	-	1,007	-	-

Notes:

a Schools and programs that are part of a "school choice area" pull enrollments from the school(s) that have resident areas, as defined by attendance boundaries. The individual school and calculated total capacities and enrollments for school choice areas are reported to show current and projected seating overage/shortage and overcrowding. If any of the school choice area schools is multi-track, then the service area is considered overcrowded.

b School's current operating capacity, or the maximum number of students the school can serve while operating on its current calendar. Excludes capacity allocated to charter co-locations. Includes capacity for magnet program.

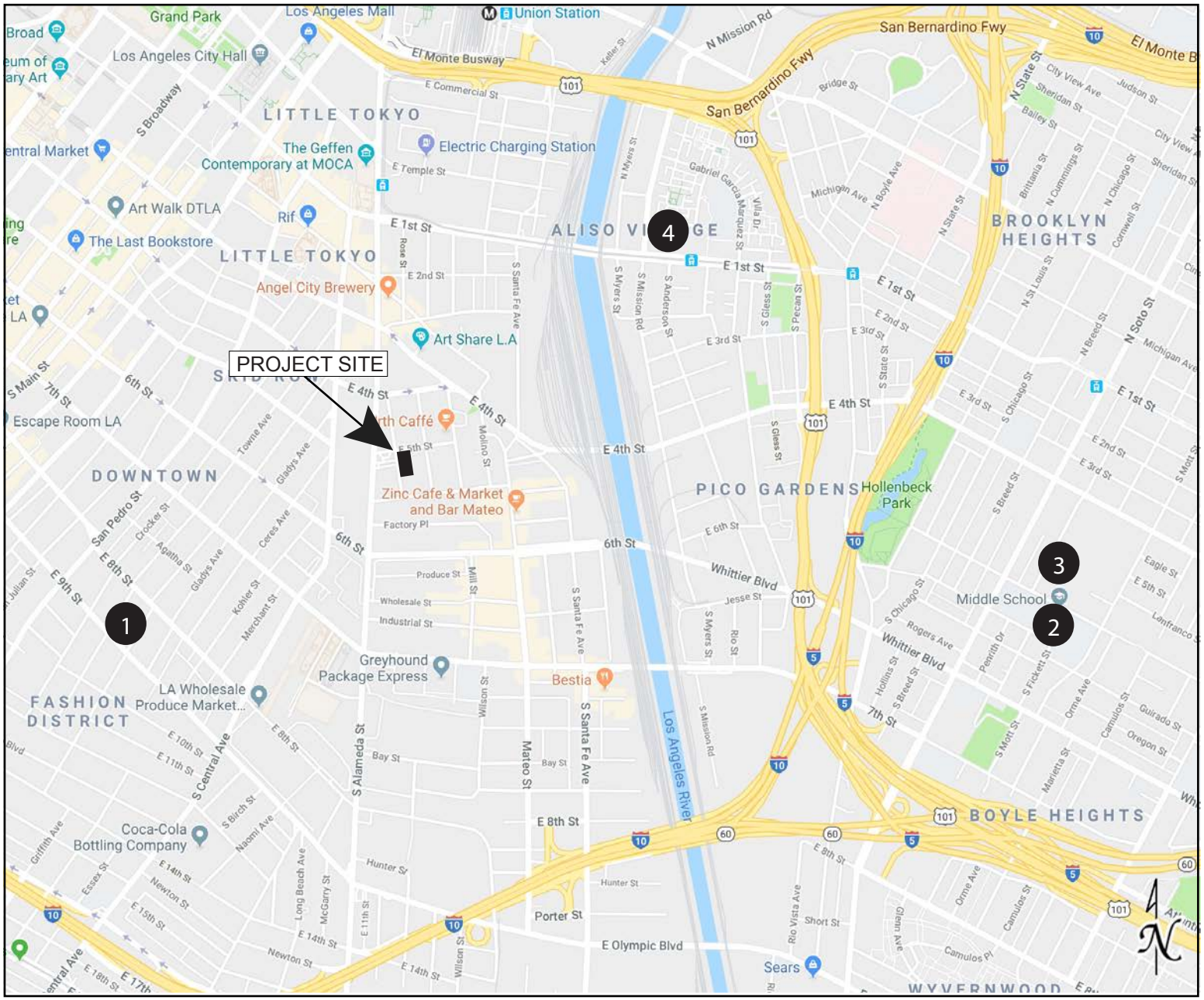
c The total number of students living in the school's attendance area and who are eligible to attend the school plus students enrolled at any on-site magnet centers.

d The number of students actually attending the school now, including magnet students.

*e Current seating overage or **(shortage)**: equal to (current capacity) – (resident enrollment)*

f Current overcrowded status of the school. The school is currently overcrowded if any of these conditions exist: 1) school is currently on a multi-track calendar; 2) there is currently a seating shortage; or 3) there is a seating overage of LESS THAN or EQUAL TO a "safety margin" of 20 seats.

*Source: LAUSD Schools Enrollments and Capacities Report; Written correspondence with Vincent Maffei, School Management Service and Demographics, LAUSD, June 17, 2021, **Appendix K** of this Draft EIR.*



1. 9th Street Elementary: 835 Standford Avenue
2. Hollenbeck Middle School: 2510 E. 6th Street
3. Theodore Roosevelt High School: 456 South Mathews Street
4. Felicitas & Gonzalo Mendez Senior High School: 1200 Plaza Del Sol

Source: Google Maps, April 2019.

Figure IV.J.3-1
School Location Map

LAUSD also projects the future capacity of its schools for the next five years. **Table IV.J.3-3, Projected LAUSD School Capacity and Enrollment**, shows LAUSD's project capacity at each of these schools serving the Project vicinity. As reported by LAUSD no new school construction is planned in the Project Vicinity.[13]

Table IV.J.3-3
Projected LAUSD School Capacity and Enrollment

School Name		Projected Enrollment[b]	Projected Seating Overage/ (Shortage)[c]	Overcrowded[d]
9th Street Elementary School (K-5)		272	68	No
Hollenbeck Middle School (6-8)		1,377	**(252)**	No
School Choice Area Totals[a] Boyle Heights Academic Zone of Choice		3,055	**(511)**	Yes
Roosevelt Senior High School		-	-	-
Mendez Senior High School		-	-	-

Notes:
a Schools and programs that are part of a "school choice area" pull enrollments from the school(s) that have resident areas, as defined by attendance boundaries. The individual school and calculated total capacities and enrollments for school choice areas are reported to show current and projected seating overage/shortage and overcrowding. If any of the school choice area schools is multi-track, then the service area is considered overcrowded.
b Projected 5-year total number of students living in the school's attendance area and who are eligible to attend the school Includes magnet centers.
*c Projected seating overage or **(shortage)**: equal to (projected capacity) – (projected enrollment)*
d Projected overcrowding status of the school. The school will be considered overcrowded in the future if any of these conditions exist: 1) school remains on a multi-track calendar; 2) there is a seating shortage in the future; or 3) there is a seating overage of LESS THAN or EQUAL TO a "safety margin" of 20 seats in the future.'

*Source: LAUSD Schools Enrollments and Capacities Report; Written correspondence with Vincent Maffei, School Management Service and Demographics, LAUSD, June 17, 2021, **Appendix K** of this Draft EIR.*

(a) Schools Serving the Project Site

(i) 9th Street Elementary School

Ninth Street Elementary School is located at 835 Stanford Avenue, located approximately 1.2 miles west of the Project Site, and offers instruction for grades K-5 on a single-track calendar. As seen in **Table IV.J.3-2**, during the 2019-2020 academic year, 9th Street Elementary School had a total capacity of 340 students, a residential enrollment of 286 students, and an actual enrollment of 314 students. Therefore, based on 9th Street Elementary School's capacity of 340 students and its residential enrollment of 286 students, the school had available capacity of 54 seats during the 2019-2020 school year. When the actual enrollment number is used to calculate seating capacity (compared to current capacity), 9th Street Elementary School had an available capacity

[13] Written correspondence with Rena Perez, Director of Master Planning & Demographics, LAUSD, July 12, 2017, **Appendix K** of this Draft EIR.

of 26 seats. The school is not considered overcrowded based on both resident capacity (students living in the attendance area who are eligible to attend the school) and actual enrollment.[14]

LAUSD's five-year projection for 9th Elementary School indicates that in the 2026-2027 academic year, the school is projected a resident enrollment of 272 students, resulting in a surplus of 68 seats. Therefore, 9th Street Elementary School is not expected to experience overcrowding in the future.[15]

(ii) Hollenbeck Middle School

Hollenbeck Middle School is located at 2510 E 6th Street, approximately 1.5 miles east of the Project Site, and offers instruction for grades 6-8 on a single-track calendar. During the 2019-2020 academic year, Hollenbeck Middle School had a total capacity of 1,125 students, a residential enrollment of 1,640 students, and an actual enrollment of 1,134 students. Therefore, based on Hollenbeck Middle School's capacity of 1,125 students and its residential enrollment of 1,640 students, the school had a shortage of 515 seats during the 2019-2020 school year. When the actual enrollment number is used to calculate seating capacity (compared to current capacity), Hollenbeck Middle School had a shortage of 9 seats. Therefore, the school is not considered overcrowded based on resident capacity (students living in the attendance area who are eligible to attend the school), as well as actual enrollment.[16]

LAUSD's five-year projection for Hollenbeck Middle School indicates that in the 2026-2027 academic year, the school is projected a resident enrollment of 1,377 students, resulting in a shortage of 252 seats. Therefore, Hollenbeck Middle School is not projected to experience overcrowding in the near future.[17]

(iii) Boyle Heights Academic Zone of Choice High Schools

In its vision to provide every student with a quality education and environment, the LAUSD has implemented a strategy called Zones of Choice to increase the number of personalized educational options available to resident high school of Choice are geographic areas that feature different high school options that offer college preparatory education and career preparation. The Boyle Heights Zone of Choice is located in the LAUSD's East Local District.[18]

Students living in the Boyle Heights Academic Zone of Choice area are allowed to apply for one of two high schools, which include: Theodore Roosevelt High School located at 456 South Mathews Street, approximately 1.9 miles east of the Project Site, and, Felicitas & Gonzalo

[14] Written correspondence with Vincent Maffei, School Management Service and Demographics, LAUSD, June 17, 2021, **Appendix K** of this Draft EIR.
[15] Written correspondence with Vincent Maffei, School Management Service and Demographics, LAUSD, June 17, 2021, **Appendix K** of this Draft EIR.
[16] Written correspondence with Vincent Maffei, School Management Service and Demographics, LAUSD, June 17, 2021, **Appendix K** of this Draft EIR.
[17] Written correspondence with Vincent Maffei, School Management Service and Demographics, LAUSD, June 17, 2021, **Appendix K** of this Draft EIR.
[18] Written correspondence with Vincent Maffei, School Management Service and Demographics, LAUSD, June 17, 2021, **Appendix K** of this Draft EIR.

Mendez Senior High School located at 1200 Plaza Del Sol, approximately 1.2 miles northeast of the Project Site. Additionally, Roosevelt High School hosts a by-application magnet center, Roosevelt Math, Science and Technology Magnet.

During the 2019-2020 academic year, Boyle Heights Academic Zone of Choice high schools had a total capacity for 2,544 students, a residential enrollment of 3,374 students, and an actual enrollment of 2,348 students. Therefore, despite an actual enrollment of 2,348 students, which is lower than the capacity of 2,544 students, based on residential enrollment of 3,374 students, Boyle Heights Academic Zone of Choice high schools has a shortage of 830 seats and are considered overcrowded under existing conditions.[19]

LAUSD's five-year projection (2026-2027) for Boyle Heights Academic Zone of Choice high schools indicates that the schools are projected an enrollment of 3,055 students, resulting in a shortage of 511 seats. Therefore, Boyle Heights Academic Zone of Choice high schools are projected to continue to experience overcrowding in the future.[20]

(iv) Charter Schools

Charter schools originated from the Charter School Act of 1992. Typically, a charter school is granted by the LAUSD Board of Education and approved the state for a period of up to five years. LAUSD maintains two types of charter schools: conversion charters which are existing LAUSD schools that later become charters; and start-ups, which are charter schools that are newly created by any member of the public (e.g., educators, parents, foundations, and others). Charter schools are open to any student who wishes to attend, from any area within LAUSD. Currently, there are 275 charter schools (50 Affiliated, 225 Independent) under LAUSD jurisdictions, serving more than 112,500 students in grades kindergarten through 12th grade.[21]

The charter schools within one-and-a-half miles of the Project Site (similar to distance to local public schools) include Arts in Action Community Middle School (grades 6th-7th), Extera Public School (K-8th), Jardin de la Infancia (K-1st), Metro Charter School (K-5th) Para Los Niños Charter School (K-5th), Para Los Niños Middle School (6th-8th), Puente Charter School (K), SIATech Boyle Heights and USC Hybrid High School (9th-12th).[22] Based on information provided by LAUSD, charter schools do not have residential attendance boundaries and enrollment data for charter schools are not regularly reported to LAUSD. Thus, enrollment projections or capacity analyses provided by LAUSD are not inclusive of charter schools.

[19] Written correspondence with Vincent Maffei, School Management Service and Demographics, LAUSD, June 17, 2021, **Appendix K** of this Draft EIR.

[20] Written correspondence with Vincent Maffei, School Management Service and Demographics, LAUSD, June 17, 2021, **Appendix K** of this Draft EIR.

[21] LAUSD Charter Schools Division, https://achieve.lausd.net/charter. Accessed August 22, 2022.

[22] California Charter School Association, Find a Charter School, https://www.ccsa.org/. Accessed August 22, 2022.

(v) Magnet Schools

The option to attend "magnet" programs is also available to students living within the service boundaries of LAUSD. Magnet programs provide specialized curriculums and instructional approaches to attract a voluntary integration of students from a variety of neighborhoods. Magnet programs typically establish a unique focus such as gifted and talented, math and science, performing arts, or basic skills programs. Some magnet programs occupy entire school sites, while other magnet centers are located on regular school campuses with access to activities and experiences shared with the host school. Currently, there are 312 Magnet Programs located throughout the District.[23] Two of the Project Site service area schools offer magnet programs, which include: Hollenbeck Middle School (Law/Government/Police Academies); and Roosevelt High School (Science, Technology and Math) Since enrollment is application based for magnet schools, overcrowding is not determined for magnet schools.[24]

(vi) Private Schools

In addition to publicly available schools, there are also a number of private schools in the Project vicinity that could potentially serve as alternatives to LAUSD schools. There are six private schools within one-mile of the Project Site including two high schools, one K-8th school and three preschools. Within three miles of the Project Site there are approximately 30 private schools.[25] These private facilities generally have smaller student populations and higher teacher-student ratios than public schools and are often parochial. The private school identification is provided for information purposes only and does not relate to LAUSD current or future enrollment capacity levels.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the *State CEQA Guidelines* the Project would have a significant impact related to schools if it would:

Threshold (a): ***Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools.***

[23] LAUSD Magnet Programs, https://echoices.lausd.net/Magnet/#gsc.tab=0. Accessed August 22, 2022.
[24] LAUSD Magnet Programs, , https://echoices.lausd.net/Magnet/#gsc.tab=0. Accessed August 22, 2022.
[25] Private School Review website, https://www.privateschoolreview.com/. Accessed August 22, 2022.

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the *2006 L.A. CEQA Thresholds Guide*, as appropriate, to assist in answering the Appendix G Threshold questions.

The *L.A. CEQA Thresholds Guide* identifies the following criteria to evaluate public school impacts:

(1) Population Growth

- *The population increase resulting from the proposed project, based on the increase in residential units or square footage of non-residential floor area.*

(2) School Services

- *The demand for school services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAUSD services (facilities, equipment and personnel) and the project's proportional contribution to the demand;*

- *Whether (and the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions which would create a temporary or permanent impact on the school(s); and*

- *Whether the project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).*

b) Methodology

The environmental impacts of the Project with respect to LAUSD school facilities are determined based on the enrollment and capacity of existing and reasonably foreseeable proposed LAUSD school facilities in the Project area, and the number of students that the Project would generate upon occupancy of the Project.[26] Based on these projections, it is determined whether the Project would exceed the capacity of any existing or proposed LAUSD schools such that a new or expanded school would be needed.

c) Project Design Features

Construction and operation of the Project would be implemented in accordance with applicable regulatory and code requirements related to schools. No specific Project Design Features are proposed with regard to schools.

[26] Based on student generation factors provided in the 2020 Developer Fee Justification Study for Los Angeles Unified School District, March 2020.

d) Analysis of Project Impacts

As compared to the Project, the Flexibility Option would change the use of the second floor from residential to commercial, and would not otherwise change the Project's land uses or size. The overall commercial square footage provided would be increased by 22,493 square feet to 45,873 square feet and, in turn, there would be a reduction in the number of live/work units from 185 to 159 units and an increase in the number of bicycle spaces from 154 to 161. The overall building parameters would remain unchanged and the design, configuration, and operation of the Flexibility Option would be comparable to the Project. In the analysis of Project impacts presented below, where similarity in land uses, operational characteristics and project design features between the Project and the Flexibility Option would be essentially the same, the conclusions regarding the impact analysis and impact significance determination presented below for the Project would be the same under the Flexibility Option. For those thresholds where numerical differences exist because of the differences in project parameters between the Project and Flexibility Option, the analysis is presented separately.

Threshold (a): ***Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?***

Numerical differences exist for these thresholds because of the differences in project parameters between the Project and Flexibility Option, therefore these analyses are presented separately.

(1) Impact Analysis

(a) Project

(i) Construction

The Project would generate part-time and full-time jobs associated with construction of the Project between the start of construction and Project buildout. However, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. The construction industry differs from most other sectors in several ways:

- There is no regular place of work. Construction workers regularly commute to job sites that change many times over the course of a year. Their sometimes-lengthy daily commutes are facilitated by the off-peak starting and ending times of the typical construction workday.
- Many construction workers are highly specialized (e.g., crane operators, steel workers, masons) and move from job site to job site as dictated by the demand for their skills; and

- The work requirements of most construction projects are highly specialized. Workers remain at a job site only for the time frame in which their specific skills are needed to complete a particular phase of the construction process.

As a result, it is likely that the skilled workers anticipated to work on the Project already reside within the region and would not need to relocate as a result of employment. Furthermore, construction activity associated with the Project would not cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of Project occupancy/buildout not result in an adverse physical change in the environment. The nearest school to the Project Site is Felicitas & Gonzalo Mendez Senior High School, located at 1200 Plaza Del Sol E, approximately 1.2 miles northeast of the Site. The construction of the Project would not require the closure of any vehicle travel lanes. Temporary closures of the sidewalks adjacent to the Project Site on 5th Street and Seaton Street may be required during portions of the construction period. Furthermore, the anticipated outbound haul route from the Project Site would be west on 5th Street, north on Alameda Street, and east on 4th Street to the Golden State Freeway (I-5) northbound on-ramp and the anticipated inbound haul route to the Project Site would be from the I-5 south to the I-10 west, exiting on Exit 15B for Alameda Street, merging onto 14th Street, heading north on Alameda Street, and east on 5th Street. However, these temporary sidewalk closures and the anticipated haul routes would not adversely affect Felicitas & Gonzalo Mendez Senior High School due to its location, which is 1.2 miles northeast of the Project Site. **Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools and construction-related impacts would be less than significant.**

(ii) Operation

The Project would involve the development of 220 live/work units and up to 46,548 square feet of neighborhood-serving commercial retail and art production uses. The Project would directly generate students through the construction of 220 new residential dwelling units. In addition, the Project's commercial retail component would generate students since employees of the commercial uses may relocate to the Project Site vicinity. As shown in **Table IV.J.3-4**, using the applicable LAUSD student generation rates for the Project's land uses, the Project would generate approximately 125 new students, consisting of 68 elementary school students (Grades K-6), 18 middle school students (Grades 6–8), and 39 high school students (Grades 9–12). As there are no students currently residing on the Project Site, the Project's student generation would result in a net increase in students attending Project area schools.

Although it is very likely that some of the students generated by the Project would already be enrolled in LAUSD schools, for a conservative analysis, it is assumed that all 125 students generated by the Project would be new to the school district. As previously discussed, students generated by the Project would attend 9th Street Elementary School and Hollenbeck Middle School with a choice of one of the two Boyle Heights Academic Zone of Choice (Theodore

Roosevelt Senior High or Felicitas and Gonzalo Mendez Senior High). Based on existing enrollment and capacity data from LAUSD presented in **Tables IV.J.3-2**, 9th Street Elementary School and Hollenbeck Middle School would not have adequate capacity to accommodate the new students generated by the Project under existing conditions. Specifically, the addition of the 68 Project-generated elementary school students could not be accommodated as the available capacity at 9th Street Elementary School is 54 seats. Hollenbeck Middle School does not have available capacity, with a shortage of 515 seats and could, therefore, not accommodate the additional 18 Project-generated middle school students. As indicated in **Table IV.J.3-2** the Boyle Heights Academic Zone of Choice area would not have adequate capacity to accommodate the 39 new students generated by the Project under existing conditions as there is an existing shortage of 830 seats.

Table IV.J.3-4
Project Student Generation

Land Use	Size	Students Generated[a]			
		Elementary (K-6)	Middle School (7-8)	High School (9-12)	Total
Multi-Family Residential	220 du	50	13	29	92
Commercial	46,548 sf	15	4	9	28
Office and Art Production Related Uses	4,350 sf	3	1	1	5
Total Projected Students		**68**	**18**	**39**	**125**

Note: du = dwelling unit; sf = square feet

a *Based on student generation factors provided in the 2020 Developer Fee Justification Study for Los Angeles Unified School District, March 2020. The following student generation rates are applied for residential uses: 0.2269 students per household (grades K-6) (220 x 0.2269=49.91), resulting in 50 (rounded) students, 0.0611 students per household (grades 7-8) (220 x 0.0611=13.44), resulting in 13 (rounded) students, and 0.1296 students per household (grades 9-12) (220 x 0.1296=28.51), resulting in 29 (rounded) students (Table 3). The student generation rate of 0.0027 (employees per square foot) for "Neighborhood Shopping Center" (Table 14) uses is applied for commercial uses (46,548 x 0.0027 x 0.2249 = 28.27), resulting in 28 (rounded) students. The student generation rate of 0.00479 (employees per square foot) for "Standard Commercial Office" (Table 14) uses is applied for office and art production related uses (4,350 x 0.00479 x 0.2249 = 4.69), resulting in 5 (rounded) students. Since the LAUSD School Fee Justification Study does not specify which grade levels students fall within for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 54 percent elementary school, 14 percent middle school, and 32 percent high school).*

Source: EcoTierra Consulting, Inc., May 2021.

In considering projected future capacity data from LAUSD presented in **Table IV.J.3-3**, only 9th Street Elementary School is projected to have capacity to accommodate the Project generated students. It is projected that Hollenbeck Middle School would have a shortage of 252 seats, thus with the addition of 18 students generated by the Project, there would be a shortage of 270 seats. The Boyle Heights Academic Zone of Choice high schools are projected to have a shortage of 511 seats and with the addition of the 39 Project-generated high school students there would be a shortage of 550 seats under projected future conditions.

It should be noted that the number of Project-generated students, who could attend LAUSD schools serving the Project Site, would likely be less than the estimate presented above due to

the type of residential uses and options offered by LAUSD. Because of the nature of the proposed live/work units which are anticipated to be occupied by adults and their workspace and less likely households with school-aged children, the Project's projected student generation is likely to be less than estimated in the above analysis, which is based on LAUSD generation factors. The Project's large number of studio/one-bedroom (220 units) would generate few, if any, students. Additionally, the number of Project-generated students, who could attend LAUSD schools serving the Project Site, would likely be less than the estimate presented above because this analysis does not include LAUSD options that would allow students generated by the Project to enroll at other LAUSD schools located away from their home attendance area, or students who may enroll in private schools, charter schools, or participate in home- schooling. In addition, this analysis does not account for Project residents who may already reside in the school attendance boundaries and would move to the Project Site. Other LAUSD options, some of which are discussed above, that may be available to Project-generated students include the following:

1. Open enrollment that enables students anywhere within the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated open enrollment seats;
2. Magnet schools and centers which are open to qualified students in the LAUSD;
3. The Permits With Transportation Program,[27] which allows students to continue to go to the schools within the same feeder pattern of the school they were enrolled in from elementary through high school. The LAUSD provides transportation to all students enrolled in the Permits With Transportation Program regardless of where they live within the LAUSD;
4. Intra-district parent employment-related transfer permits that allow students to enroll in a school that serves the attendance area where the student's parent is regularly employed if there is adequate capacity available at the school;
5. Sibling permits that enable students to enroll in a school where a sibling is already enrolled; and
6. Childcare permits that allow students to enroll in a school that serves the attendance area where a younger sibling is cared for every day after school hours by a known child care agency, private organization, or a verifiable child care provider.

Thus, the above analysis is considered conservative and likely overestimates the Project's actual potential to generate new students. Nonetheless, based on this conservative analysis the Project has the potential to impact schools with inadequate capacity. LAUSD is responsible for building new schools and modernizing existing schools to accommodate demand. LAUSD's Facilities Services Division is managing a $25.6 billion-program to build new schools to reduce overcrowding and modernize existing campuses throughout LAUSD's service area.[28] The New School Construction Program, which was developed to relieve overcrowding and address facilities needs through the construction of new classrooms, and the Repair and Modernization Program, which improves deteriorating, aging and outdated conditions on school campuses, both guide

[27] Los Angeles Unified School District, Permits with Transportation, https://achieve.lausd.net/Page/1951. Accessed August 22, 2022.

[28] LAUSD, Facilities Services Division, FSD Bond Program, https://www.laschools.org/new-site/, Accessed August 22, 2022.

LAUSD towards their responsibility of accommodating demand. However, pursuant to Senate Bill 50, the Project Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of the Project's building permit. Pursuant to Government Code Section 65995, the payment of these fees is considered full and complete mitigation of Project-related school impacts. Therefore, payment of the applicable development school fees to the LAUSD would offset the potential impact of additional student enrollment at schools serving the Project Site. **Based on the above, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities (i.e., schools), need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools. Impacts would be less than significant.**

(b) Flexibility Option

(i) Construction

Similar to the Project, the Flexibility Option would generate part-time and full-time jobs associated with construction of the building between the start of construction and buildout. However, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Flexibility Option. The construction industry differs from most other sectors in several ways:

- There is no regular place of work. Construction workers regularly commute to job sites that change many times over the course of a year. Their sometimes-lengthy daily commutes are facilitated by the off-peak starting and ending times of the typical construction workday.
- Many construction workers are highly specialized (e.g., crane operators, steel workers, masons) and move from job site to job site as dictated by the demand for their skills; and
- The work requirements of most construction projects are highly specialized. Workers remain at a job site only for the time frame in which their specific skills are needed to complete a particular phase of the construction process.

As a result, it is likely that the skilled workers anticipated to work on the Project already reside within the region and would not need to relocate as a result of employment. Furthermore, construction activity associated with the Project would not cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/buildout not result in an adverse physical change in the environment. The nearest school to the Project Site is Felicitas & Gonzalo Mendez Senior High School, located at 1200 Plaza Del Sol E, approximately 1.2 mile northeast of the Site. The construction of the Flexibility Option would not require the closure of any vehicle travel lanes. Temporary closures of the sidewalks adjacent to the Project Site on 5th Street and Seaton Street may be required during portions of the construction period. Furthermore, the

anticipated outbound haul route from the Project Site would be west on 5th Street, north on Alameda Street, and east on 4th Street to the Golden State Freeway (I-5) northbound on-ramp and the anticipated inbound haul route to the Project Site would be from the I-5 south to the I-10 west, exiting on Exit 15B for Alameda Street, merging onto 14th Street, heading north on Alameda Street, and east on 5th Street. However, these temporary sidewalk closures and anticipated haul routes would not adversely affect Felicitas & Gonzalo Mendez Senior High School due to its location, which is 1.2 mile northeast of the Project Site. **Therefore, the construction employment generated by the Flexibility Option would not result in a notable increase in the resident population or a corresponding demand for schools in the vicinity of the Project Site. Impacts would not necessitate the expansion or construction of new school facilities, and therefore Flexibility Option construction impacts would be less than significant; no mitigation measures would be required.**

(ii) Operation

The Flexibility Option would involve the development of 200 live/work units and up to 64,313 square feet of neighborhood-serving commercial retail and art production uses. The Flexibility Option would directly generate students through the construction of 200 new residential dwelling units. In addition, similar to the Project, the Flexibility Option's commercial retail component would generate students since employees of the commercial uses may relocate to the Project Site vicinity. As shown in **Table IV.J.3-5**, using the applicable LAUSD student generation rates for the Flexibility Option's land uses, the Flexibility Option would generate approximately 126 new students, consisting of 68 elementary school students (Grades K-6), 19 middle school students (Grades 6–8), and 39 high school students (Grades 9–12).

Similar to the Project, students generated by the Flexibility Option would attend 9th Street Elementary School and Hollenbeck Middle School with a choice of one of the two Boyle Heights Academic Zone of Choice (Boyle Heights S.T.E.M. High School, Theodore Roosevelt Senior High, or Felicitas and Gonzalo Mendez Senior High). Based on existing enrollment and capacity data from LAUSD presented in **Tables IV.J.3-2**, 9th Street Elementary School and Hollenbeck Middle School would not have adequate capacity to accommodate the new students generated by the Flexibility Option under existing conditions. Specifically, the addition of the 68 Flexibility Option-generated elementary school students could be accommodated as the available capacity at 9th Street Elementary School is 54 seats. Hollenbeck Middle School does not have capacity, with a shortage of 515 seats and could, therefore, not accommodate the additional 19 Flexibility Option-generated middle school students. As indicated in **Table IV.J.3-2** the Boyle Heights Academic Zone of Choice area would not have adequate capacity to accommodate the 39 new students generated by the Flexibility Option under existing conditions as there is an existing shortage of 830 seats.

Table IV.J.3-5
Flexibility Option Student Generation

Land Use	Size	Students Generated[a]			
		Elementary (K-6)	Middle School (7-8)	High School (9-12)	Total
Live Work Units	200 du	45	12	26	83
Commercial	64,313 sf	21	6	12	39
Office and Art Production Related Uses	4,050 sf	2	1	1	4
Total Projected Students		**68**	**19**	**39**	**126**

Note: du = dwelling unit; sf = square feet

a *Based on student generation factors provided in the Level 1 – Developer Fee Justification Study for Los Angeles Unified School District, March 2020. The following student generation rates are applied for residential uses: 0.2269 students per household (grades K-6) (200 x 0.2269=45.38), resulting in 45 (rounded) students, 0.0611 students per household (grades 7-8) (200 x 0.0611=12.22), resulting in 12 (rounded) students, and 0.1296 students per household (grades 9-12) (200 x 0.1296=25.92), resulting in 26 (rounded) students (Table 3)The following student generation rates are applied for residential uses: 0.2269 students per household (grades K-6), 0.0611 students per household (grades 7-8), and 0.1296 students per household (grades 9-12) (Table 3). The student generation rate of 0.0027 (employees per square foot) for "Neighborhood Shopping Center" (Table 14) uses is applied for commercial uses (64,313 x 0.0027 x 0.2249 = 39.05), resulting in 39 (rounded) students. The student generation rate of 0.00479 (employees per square foot) for "Standard Commercial Office" (Table 14) uses is applied for office and art production related uses (4,050 x 0.00479 x 0.2249 = 4.36), resulting in 4 (rounded) students. Since the LAUSD School Fee Justification Study does not specify which grade levels students fall within for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 54 percent elementary school, 15 percent middle school, and 31 percent high school).*

Source: EcoTierra Consulting, Inc., May 2021.

In considering projected future capacity data from LAUSD presented in **Table IV.J.3-3**, only 9th Street Elementary School is projected to have capacity to accommodate the Project generated students. It is projected that Hollenbeck Middle School would have a shortage of 252 seats, thus with the addition of 18 students generated by the Flexibility Option, there would be a shortage of 270 seats. The Boyle Heights Academic Zone of Choice high schools are projected to have a shortage of 511 seats and with the addition of the 39 generated high school students there would be a shortage of 550 seats under projected future conditions.

Similar to the Project, because of the nature of the proposed live/work units which are anticipated to be occupied by adults and their workspace and less likely households with school-aged children, the Flexibility Option's projected student generation is likely to be less than estimated in the above analysis, which is based on LAUSD generation factors. The large number of studio/one-bedroom would generate few, if any, students. Additionally, the number of project-generated students, who could attend LAUSD schools serving the Project Site, would likely be less than the estimate presented above because this analysis does not include LAUSD options that would allow students generated by the Flexibility Option to enroll at other LAUSD schools located away from their home attendance area, or students who may enroll in private schools or participate in home-schooling. In addition, this analysis does not account for residents who may already reside in the school attendance boundaries and would move to the Project Site. Other LAUSD options, some of which are discussed above, that may be available to Flexibility Option-generated students include the following:

1. Open enrollment that enables students anywhere within the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated open enrollment seats;
2. Magnet schools and centers which are open to qualified students in the LAUSD;
3. The Permits With Transportation Program,[29] which allows students to continue to go to the schools within the same feeder pattern of the school they were enrolled in from elementary through high school. The LAUSD provides transportation to all students enrolled in the Permits With Transportation Program regardless of where they live within the LAUSD;
4. Intra-district parent employment-related transfer permits that allow students to enroll in a school that serves the attendance area where the student's parent is regularly employed if there is adequate capacity available at the school;
5. Sibling permits that enable students to enroll in a school where a sibling is already enrolled; and
6. Childcare permits that allow students to enroll in a school that serves the attendance area where a younger sibling is cared for every day after school hours by a known child care agency, private organization, or a verifiable child care provider.

Similar to the Project, the above analysis is considered conservative and likely overestimates the Flexibility Option's actual potential to generate new students. Nonetheless, the Flexibility Option, like the Project, has the potential to impact schools with inadequate capacity. However, pursuant to Senate Bill 50, the Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of the building permit. Pursuant to Government Code Section 65995, the payment of these fees is considered full and complete mitigation of project-related school impacts. Therefore, payment of the applicable development school fees to the LAUSD would offset the potential impact of additional student enrollment at schools serving the Project Site. **Accordingly, with adherence to existing regulations, impacts on schools would be less than significant; no mitigation measures would not be required.**

(2) Mitigation Measures

Project-level impacts for the Project and the Flexibility Option, with regard to school facilities, would be less than significant; no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts for the Project and the Flexibility Option, with regard to school facilities, would be less than significant without mitigation.

[29] Los Angeles Unified School District, Permits with Transportation, https://achieve.lausd.net/Page/1951. Accessed August 22, 2022.

4. Cumulative Impacts

Numerical differences exist regarding the impact analysis and impact significance determination presented below because of the differences in project parameters between the Project and Flexibility Option, therefore these analyses are presented separately.

a) Impact Analysis

(1) Project

As identified in **Section III, Environmental Setting**, of this Draft EIR, there are 17 Related Projects located in the Project vicinity. Cumulative growth in the greater Project area through includes specific known development projects, growth that may be projected as result of the land use designation and policy changes contained in the Community Plan Update, as well as general ambient growth projected to occur. As such, these Related Projects would have the potential to combine with the Project and cumulatively impact 9th Street Elementary School, Hollenbeck Middle School and the Boyle Heights Academic Zone of Choice schools. All 17 Related Projects are located within attendance boundaries of at least one of the schools serving the Project Site. Based on the rates provided in the 2020 LAUSD Developer Fee Justification Study, the 17 Related Projects would generate a total of 2,955 students within the school attendance boundaries identified for this Project. As shown in **Table IV.J.3-5**, this total number would consist of 1,604 elementary school students, 434 middle school students, and 918 high school students.

As indicated above, the Project would generate a total of approximately 125 new students, consisting of 68 elementary students, 18 middle school students, and 39 high school students. Therefore, as shown in **Table IV.J.3-6, Total Cumulative Student Generation (Project)**, the Project, in combination with the 17 Related Projects, would have the potential to generate a cumulative total of 3,080 new school-aged students. This cumulative total would consist of 1,672 elementary students, 452 middle school students, and 957 high school students. Based on existing and projected enrollment and capacity data from LAUSD (refer to **Tables IV.J.3-2 and IV.J.3-3**, above), the schools serving the Project and the Related Projects would not have adequate capacity to serve the cumulative demand.

Table IV.J.3-6
Total Cumulative Student Generation (Project)

Land Use	Students Generated [a]			
	Elementary (K-6)	Middle School (7-8)	High School (9-12)	Total
Related Projects [a]	1,604	434	918	2,955
Project	68	18	39	125
Total Cumulative Students	1,672	452	957	3,080

Note: du = dwelling unit; sf = square feet
*a A list of Related Projects is provided in **Table III-1** of **Section III, Environmental Setting**, of this Draft EIR.*
*b The tabulation of Related Projects' student generation is presented in **Appendix J** of this Draft EIR.*
Source: EcoTierra Consulting, Inc., May 2021.

Specifically, with the addition of students generated by the Project in combination with the Related Projects, 9th Street Elementary School would have a shortage of 1,658 seats (i.e., the existing excess capacity of 54 seats minus the 1,672 students generated by the Project and Related Projects). Hollenbeck Middle School would have a shortage of 967 seats (i.e., the existing shortage of 515 seats plus the 452 students generated by the Project and Related Projects). For the Boyle Heights Academic Zone of Choice high schools, there would be a shortage of 1,787 seats (i.e., the existing shortage of 830 seats plus the 957 students generated by the Project and Related Projects).

With regard to projected future capacity data from LAUSD, 9th Street Elementary School would have a shortage of 1,604 seats (i.e., the future excess capacity of 68 seats minus the 1,672 students generated by the Project and Related Projects). At Hollenbeck Middle School, there would be a shortage of 704 seats (i.e., the future shortage of 252 seats plus the 452 students generated by the Project and Related Projects). The Boyle Heights Academic Zone of Choice Schools would experience a shortage of 1,468 seats (i.e., the future shortage of 511 seats plus the 957 students generated by the Project and Related Projects).

Therefore, the students generated by the Project, in combination with the Related Projects located within the school attendance boundaries, would cause a shortage of seats when compared to existing conditions and projected school capacity at 9th Elementary, Hollenbeck Middle School and the Boyle Heights Academic Zone of Choice schools. This shortage would need to be addressed by LAUSD with expansion of these school facilities or build new schools with additional classrooms to accommodate future attendance. This degree of cumulative growth would substantially increase the demand for LAUSD services in the Project area. However, as previously discussed, the Project and Related Projects would be required to pay development impact fees pursuant to AB 50 to the LASUD Developer Fee office. Pursuant to Government Code Section 65995, the payment of these fees would be considered full and complete mitigation of school impacts generated by the Project and the Related Projects. **Therefore, with payment of these fees, the Project and related projects would have a less-than-significant cumulative impact.**

(2) Flexibility Option

Similar to the Project cumulative discussion, of the 17 Related Projects, all 17 are located within attendance boundaries of at least one of the schools serving the Project Site. Based on the rates provided in the 2020 LAUSD Developer Fee Justification Study, the Related Projects would generate 1,604 elementary school students, 434 middle school students, and 918 high school students.

As indicated above, the Flexibility Option would generate a total of approximately 126 new students, consisting of 68 elementary students, 19 middle school students, and 39 high school students. Therefore, as shown in **Table IV.J.3-7, Total Cumulative Student Generation (Flexibility Option),** the Flexibility Option, in combination with the 17 Related Projects, would have the potential to generate a cumulative total of 3,081 new school-aged students. This cumulative total would consist of 1,672 elementary students, 453 middle school students, and

957 high school students. Based on existing and projected enrollment and capacity data from LAUSD (refer to **Tables IV.J.3-2** and **IV.J.3-3**, above), the schools serving the Flexibility Option and the Related Projects would not have adequate capacity to serve the cumulative demand.

Table IV.J.3-7
Total Cumulative Student Generation (Flexibility Option)

Land Use	Students Generated [a]			
	Elementary (K-6)	Middle School (7-8)	High School (9-12)	Total
Related Projects [a]	1,604	434	918	2,955
Flexibility Option	68	19	39	126
Total Cumulative Students	1,672	453	957	4,068

Note: du = dwelling unit; sf = square feet
*a A list of Related Projects is provided in **Table III-1** of **Section III, Environmental Setting**, of this Draft EIR.*
*b The tabulation of Related Projects' student generation is presented in **Appendix J** of this Draft EIR.*
Source: EcoTierra Consulting, Inc., May 2021.

Specifically, with the addition of students generated by the Flexibility Option in combination with the Related Projects, 9th Street Elementary School would have a shortage of 1,658 seats (i.e., the existing excess capacity of 54 seats minus the 1,672 students generated by the Flexibility Option and Related Projects). Hollenbeck Middle School would have a shortage of 968 seats (i.e., the existing shortage of 515 seats plus the 453 students generated by the Flexibility Option and Related Projects). For the Boyle Heights Academic Zone of Choice high schools, there would be a shortage of 1,787 seats (i.e., the existing shortage of 830 seats plus the 957 students generated by the Flexibility Option and Related Projects).

With regard to projected future capacity data from LAUSD, 9th Street Elementary School would have a shortage of 1,604 seats (i.e., the future excess capacity of 68 seats minus the 1,672 students generated by the Flexibility Option and Related Projects). At Hollenbeck Middle School, there would be a shortage of 705 seats (i.e., the future shortage of 252 seats plus the 453 students generated by the Flexibility Option and Related Projects). The Boyle Heights Academic Zone of Choice Schools would experience a shortage of 1,468 seats (i.e., the future shortage of 511 seats plus the 957 students generated by the Flexibility Option and Related Projects).

Therefore, the students generated by the Flexibility Option, in combination with the Related Projects located within the school attendance boundaries, would cause a shortage of seats when compared to existing conditions and projected school capacity at 9th Elementary, Hollenbeck Middle School and the Boyle Heights Academic Zone of Choice schools. This shortage would need to be addressed by LAUSD with expansion of these school facilities or build new schools with additional classrooms to accommodate future attendance. This degree of cumulative growth would substantially increase the demand for LAUSD services in the area. However, as previously discussed, the Flexibility Option and Related Projects would be required to pay development impact fees pursuant to AB 50 to the LASUD Developer Fee office. Pursuant to Government Code Section 65995, the payment of these fees would be considered full and complete mitigation of school impacts generated by the Related Projects. **Therefore, with payment of these fees, the Flexibility Option and related projects would have a less-than-significant cumulative impact.**

b) Mitigation Measures

Cumulative impacts related to schools for both the Project and Flexibility Option would be less than significant; no mitigation measures are required.

c) Level of Significance After Mitigation

Cumulative impacts related to schools for both the Project and Flexibility Option were determined to be less than significant without mitigation.