

IV. Environmental Impact Analysis

K.3. Public Services – Schools

1. Introduction

This section evaluates the Project’s potential impacts on school facilities and services operated by the Los Angeles Unified School District (LAUSD), which has jurisdiction of public schools. The analysis estimates the number of students that would be generated by the Project using the LAUSD student generation rates and focuses on whether existing LAUSD school facilities would have sufficient available capacity to accommodate these students. The analysis addresses all levels of educational facilities operated by the LAUSD (i.e., elementary, middle, and high schools). The analysis is based, in part, on written correspondence from LAUSD, which is provided in Appendix L-3 of this Draft EIR.¹

2. Environmental Setting

a) Regulatory Framework

(1) California Education Code

Educational services for the Project are subject to the rules and regulations of the California Education Code and governance of the State Board of Education. The State has passed legislation for the funding of local and public schools and provided the majority of monies to fund education in the State. To assist in providing facilities to serve students generated from new development projects, the State passed Assembly Bill (AB) 2926 in 1986, allowing school districts to collect impact fees from developers of new residential, commercial, and industrial developments. 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.²

(2) Senate Bill 50

The Leroy F. Greene School Facilities Act of 1998 (known as Senate Bill 50 [SB 50]), enacted in 1998, is a program for funding school facilities largely based on matching funds. It placed a \$9.2 billion State bond measure (Proposition 1A), which included grants

¹ Rena Perez, Director, Los Angeles Unified School District (LAUSD), letter correspondence dated December 19, 2017. Provided in Appendix L-3 of this Draft EIR.

² California Education Code Section 17620(a)(1).

for modernization of existing schools and construction of new schools, on the ballot of the election of November 3, 1998. Proposition 1A was approved by voters, enabling SB 50 to become fully operative. The new construction grant provides funding on a 50/50 State and local match basis. The modernization grant provides funding on a 60/40 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.³

SB 50 permits the LAUSD to levy a building permit fee, charge, dedication requirement, or other requirement against any development project within its boundaries, for the purpose of funding the construction or reconstruction of school facilities. SB 50 also caps the fees a developer may be required to pay. Fees are established by the State Allocation Board every two years based on demonstrated need as set forth in the LAUSD's School Facilities Needs Analysis. School district building permit fees for new construction within the City of Los Angeles (City) at the time of this writing are as follows:⁴

- Office: \$1.57/square foot
- Retail: \$1.31/square foot
- Commercial: \$0.61/square foot
- Hotel: \$0.52/square foot
- Residential: \$3.79/square foot
- Parking Garage: \$0.39/square foot

Pursuant to California Government Code Section 65995, the payment of these fees by a developer serves to mitigate to a less-than-significant level all potential impacts on school facilities that may result from implementation of a project.⁵

(3) LAUSD Facilities Service Division Strategic Execution Plan

The LAUSD Facilities Services Division (FSD) is responsible for the execution of the District's voter-approved school construction bond programs, the maintenance and operations of schools, the utilization of existing assets, and master planning for future capital projects. The FSD provides an annual update on bond program expenditures in its Strategic Execution Plan.

As stated in the 2019 Strategic Execution Plan,⁶ the primary goal of bond program expenditures was originally the reduction of overcrowding through the provision of

³ State of California, Office of Public School Construction, *School Facility Program Guide*, October 24, 2012.

⁴ City of Los Angeles Department of Building and Safety, Building Permit Fee Estimate Calculator, 2021, <http://netinfo.ladbs.org/feecalculator.nsf/3950786566dd7fcc88258152007def26?OpenForm>. Accessed March 22, 2021. As noted on this website, school district fees are subject to change without notice and are finally determined at the time of application for a building permit.

⁵ California Government Code Section 65996.

⁶ LAUSD, Facilities Services Division, *Strategic Execution Plan*, 2019.

opportunities for students to attend neighborhood schools operating on a traditional, two-semester calendar. The goal was met with the development of 131 new schools for K-12 students, allowing students to attend schools in their neighborhoods that operate on a traditional two-semester calendar. Additional new construction projects were developed that were not necessary to meet the goal, but to further relieve overcrowding, reduce reliance on portable classrooms, and to improve school facilities. The bond program is now focused on improving equity between newer and older schools. The next phase will guide development of projects to modernize schools, build school additions in growing neighborhoods, address critical repairs and safety issues, upgrade technology infrastructure and systems, and improve accessibility under the Americans with Disabilities Act. The bond program now includes more than \$5.3 billion in projects that are underway.

b) Existing Conditions

The LAUSD is the largest public school system in California and the second-largest in the United States, in terms of number of students. The LAUSD encompasses approximately 710 square miles and serves the City of Los Angeles, all or portions of 26 other cities, as well as several unincorporated areas of Los Angeles County. Approximately 4.8 million persons live within the District's boundaries. The LAUSD provides kindergarten through high school (K–12) education and adult education to a total of 558,696 K-12 students with a total enrollment of 713,871 students when including adult education, enrolled throughout 1,306 schools and centers, including: 19 primary school centers, 448 elementary schools, 81 middle schools, 94 senior high schools, 54 option schools, 49 magnet schools, 25 multi-level schools, 13 special education schools, two home/hospital, 169 K-12 magnet centers (on regular campuses), 224 charter schools, and 120 other schools/centers.⁷ For the 2017–2018 school year, the LAUSD employed 60,240 personnel, nearly half (43 percent) of whom are classroom teachers.⁸ The LAUSD's Fiscal Year 2017–2018 total budget was approximately \$7.52 billion.⁹ Outside of LAUSD, students may also attend non-LAUSD schools, including public charter schools, magnet schools, pilot schools, and private schools.

The LAUSD is divided into six local districts (Northeast, Northwest, East, West, Central, and South), with the Project Site located in the Local District East.¹⁰ Attendance boundaries for LAUSD schools are determined based on the number of miles in a school's enrollment area, the local geography, and projected capacities and enrollments. Changes in attendance boundaries are based on maintaining an equitable balance of enrollment against capacity between schools, or to assign students from an overcrowded school to an adjacent school with space to accommodate additional students. These attendance boundaries are intended to relieve overcrowding, to plan for enrollment increases anticipated from new housing, and to address safety issues.¹¹

⁷ LAUSD, *Fingertip Facts 2017–2018*. Accessed March 2018.

⁸ LAUSD, *Fingertip Facts 2017–2018*.

⁹ LAUSD, *Fingertip Facts 2017–2018*.

¹⁰ LAUSD, Local District East Map, June 2015. Accessed March 2, 2018.

¹¹ LAUSD, *LAUSD's Boundary Planning Process*, revised July 2015.

As shown in **Figure IV.K.3-1, Designated LAUSD Schools Located in the Vicinity of the Project Site**, the Project Site is located within the attendance boundaries of Ninth Street Elementary School, Hollenbeck Middle School, and the Science, Technology, Engineering, and Math (S.T.E.M.) Academy (High School) of Boyle Heights. These schools are currently operating on a single-track calendar in which instruction generally begins in mid-September and continues through late June.

The Project Site is also within a LAUSD Zone of Choice with multiple high school options, including Felicitas and Gonzalo Mendez Senior High and Theodore Roosevelt Senior High. LAUSD Zones of Choice are geographic areas encompassing multiple high school options. The high schools in each Zone are open to all resident students in the Zone. The Project Site is also located approximately 0.3 miles northeast of Metropolitan Continuation High School, a LAUSD continuation school¹² located at 727 S. Wilson Street. This school is not considered as part of the existing capacity and enrollment of LAUSD schools that would serve the Project Site. Additionally, the following seven charter schools are located within 1 mile of the Project Site:¹³

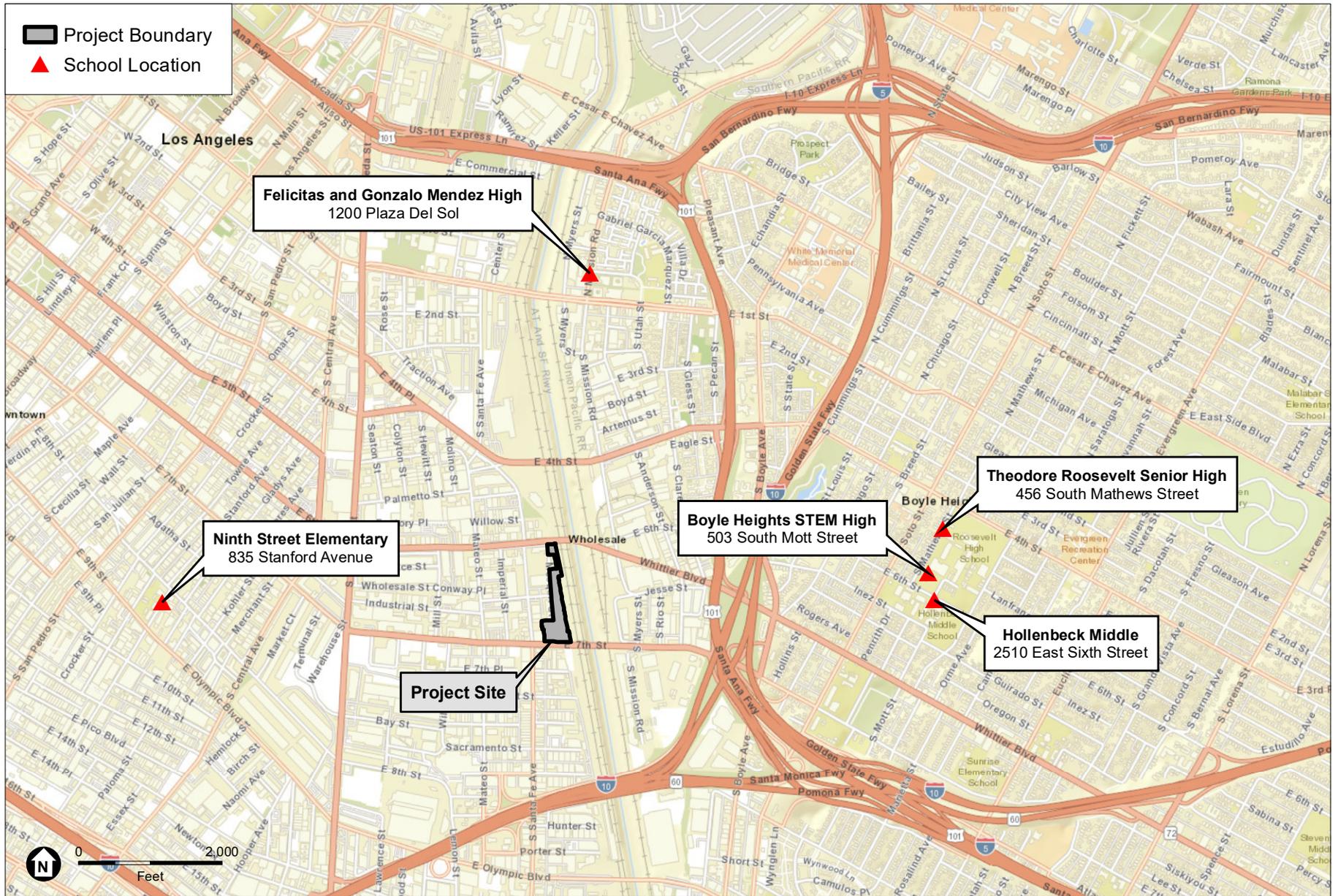
- Five Keys Charter School (1598 E. Fourth Street)
- Para Los Ninos Charter Middle School (835 Stanford Avenue)
- Para Los Ninos Charter School (1617 E. Seventh Street)
- SIATech Boyle Heights (501 S. Boyle Avenue)
- Extera Public School (2226 E. Third Street)
- Endeavor College Preparatory Charter School (1263 S. Soto Street)
- Arts in Action Community Middle School (1241 S. Soto Street, Suite 212)

As previously stated, this analysis is based on LAUSD school facilities that would serve the Project Site. While these charter schools are not included in the analysis below, the charter schools could also potentially assist in serving any new demand for schools.

According to LAUSD, available seating capacity is based on resident enrollment (i.e., the number of students living in a school's attendance area who are eligible to attend the resident school associated with the student's address) compared to the respective school's current capacity, regardless of the actual enrollment. The resident enrollment is a depiction of the enrollment pool of students that resident schools must be prepared to enroll and serve. Actual enrollment is based on the number of students enrolled, whether they live inside or outside of the attendance boundary.

¹² Continuation education is an alternative high school diploma program for students who are 16 years or older, have not graduated from high school, and are still required to attend school, and who are at risk of not graduating.

¹³ California Charter Schools Association, Find a School Search for 670 Mesquit Street, <https://www.ccsa.org/find-a-school?lat=34.0361869&lng=-118.2288143&search=670%20Mesquit%20St,%20Los%20Angeles,%20CA%2090021,%20USA>. Accessed June 11, 2020.



SOURCE: ESRI; LAUSD, 2018

670 Mesquit

Figure IV.K.3-1

Designated LAUSD Schools Located in the Vicinity of the Project Site

Table IV.K.3-1, Existing Capacity and Enrollment of LAUSD Schools Serving the Project Site, lists the LAUSD schools that would serve the Project Site, as well as their distance/direction from the Project Site, current total capacity, projected resident and actual enrollments, and seating availability.

**TABLE IV.K.3-1
EXISTING CAPACITY AND ENROLLMENT OF LAUSD SCHOOLS SERVING THE PROJECT SITE**

School Location	Distance/ Direction from Project Site^a	2016– 2017 Capacity^b	Resident Enrollment^c	Actual Enrollment^d	Current Seating Availability (Shortage)^e	Over-crowded Status^f
Ninth Street Elementary School (K–5)	1.07 miles west	360	287	342	73	No
Hollenbeck Middle School (6–8)	0.92 miles east	1,453	1,370	1,073	83	No
SCHOOL CHOICE AREA TOTALS^g (BOYLE HEIGHTS ZONE OF CHOICE)	—	3,300	3,688	2,682	(388)	Yes
S.T.E.M. Academy of Boyle Heights (9–12)	1.10 miles east	344	—	200	—	
Theodore Roosevelt Senior High (9–12)	1.07 miles northeast	1,817	—	1,485	—	
Felicitas and Gonzalo Mendez Senior High (9–12)	0.86 miles north	1,139	—	997	—	

NOTE(S):

- ^a Approximate distance/direction in miles from Project Site is a straight-line distance, not a driving distance.
- ^b School's current operating capacity for the reported school year. The maximum number of students the school can serve during the reported school year, with the school's classroom utilization, and while operating on its reported calendar. Excludes capacity allocated to charter co-locations, but 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. Includes magnet students.
- ^d The number of students actually attending the school presently, including magnet students.
- ^e Current seating availability, defined by LAUSD as an "overage" or (shortage), is equal to (current capacity) – (resident enrollment). Availability/(shortage) is the capacity remaining if all students who live in the school's attendance area attended that school.
- ^f Based on information provided by LAUSD, a school is considered overcrowded if the school has a seating shortage and/or there is a seating overage of less than or equal to a "safety margin" of 20 seats.
- ^g 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 availability/shortage and overcrowding.

SOURCE: Rena Perez, Director, LAUSD, letter correspondence dated December 19, 2017.

Per LAUSD methodology, available seating is determined by subtracting its current resident enrollment from its current capacity. A positive result indicates that the school has a surplus of seats (which means the school is operating within capacity and has seating availability), while a negative result indicates that the school has a potential shortage of seats (which means the school is overcrowded). According to LAUSD, a school is considered overcrowded if the school has a potential seating shortage and/or there is a seating overage of less than or equal to a “safety margin” of 20 seats. Because LAUSD’s methodology relies on resident enrollment rather than actual enrollment, overcrowded status refers to a potential seating shortage if all students who live in the school’s attendance area attended that school. As shown in Table IV.K.3-1, based on the information provided by LAUSD, Ninth Street Elementary School and Hollenbeck Middle School are currently operating within capacity, while the Boyle Heights Zone of Choice schools are overcrowded.

Ninth Street Elementary School has a current capacity of 360 students and a resident enrollment of 287, resulting in an estimated available capacity of 73 seats. Hollenbeck Middle School has a current capacity of 1,453 students and a resident enrollment of 1,370 students, resulting in an estimated available capacity of 83 seats.

As discussed earlier, the Project Site is located within the LAUSD Boyle Heights Zone of Choice, with multiple high school options including S.T.E.M Academy of Boyle Heights, Theodore Roosevelt Senior High, and Felicitas and Gonzalo Mendez Senior High. The three choices are calculated together to determine collective Zone of Choice capacity and enrollment rather than individually for each high school within the Zone of Choice. Based on the combined current capacity of 3,300 students and a combined resident enrollment of 3,688 students, these three Boyle Heights Zone of Choice high schools have an estimated combined potential shortage of 388 seats, and thus are operating over capacity. According to the LAUSD, the Boyle Heights Zone of Choice schools are currently overcrowded due to the potential seating shortage.¹⁴ This assessment takes into account portable classrooms at each school site, additions to existing schools that are planned or under construction, student permits and transfers, specific educational programs running at the schools, and any other operational activities or educational programming that affect the capacity of and enrollment in LAUSD schools.¹⁵ LAUSD has determined that no new schools are planned in the Project Site’s attendance boundaries.

All strategies regarding how to accommodate additional students generated by the Project are under the control of LAUSD. Some of these strategies include changes in attendance boundaries and grade reconfigurations. Additionally, the number of Project-generated students that would actually attend the LAUSD schools serving the Project Site may be less than expected since the analysis does not take into account options to allow Project-generated students to receive education elsewhere.

¹⁴ Rena Perez, letter correspondence dated December 19, 2017.

¹⁵ Rena Perez, letter correspondence dated December 19, 2017.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a 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 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, response times or other performance objectives for schools.

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the City’s 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions. The factors used to evaluate school impacts include:

- The population increase resulting from the proposed project, based on the increase in residential units or square footage of non-residential floor area;
- The demand for school services anticipated at the time of project build-out 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 analysis of enrollment effects on schools is based in part on the ability of LAUSD school facilities and services to accommodate the potential increase in students generated from development of the Project. The analysis estimates the number of students that would be generated by the Project using LAUSD student generation rates,¹⁶ and considers whether LAUSD school facilities that serve the Project Site would have sufficient available capacity to accommodate these students at the time of Project buildout. School planning for future enrollments is done by the LAUSD at five-year intervals, and is based on the estimated future resident enrollment (i.e., estimated

¹⁶ LAUSD, *2018 Developer Fee Justification Study*, March 2018.

number of eligible resident students). Current and projected enrollments/capacities use the 2016–2017 school year as a baseline, as that is the year the NOP was released. The analysis addresses three levels of education facilities operated by LAUSD (i.e., elementary, middle, and high schools), and is centered on those schools that serve the Project Site. It also considers state regulations (i.e., SB 50) and development fees as a mechanism for providing school facilities and addressing school impacts of the Project.

c) Project Design Features

No specific Project Design Features are proposed with regard to schools.

d) Analysis of Project Impacts

Threshold (a): Would the Project result in a substantial adverse physical impact associated with the provision of new or physically altered government 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?

(1) Impact Analysis

(a) Construction Impacts

Construction of the Project would require employees who are anticipated to be hired from a mobile regional construction work force that moves from project to project. Typically, construction workers pass through various development projects on an intermittent basis as their particular trades are required. Given the mobility and temporary durations of work at a particular site, and a large construction labor pool that can be drawn upon in the region, construction employees would not be expected to relocate residences (and, therefore, a student population) within this region or move from other regions as a result of their temporary work on the Project Site. Therefore, Project construction would not result in a notable increase in the resident population or generate new students needing to attend local schools.

There are no public schools located in the immediate Project vicinity that would be affected by construction activities at the Project Site. The nearest LAUSD school, Felicitas and Gonzalo Mendez Senior High, is located approximately 0.86 miles north of the Project Site. There would be no Project-related construction staging or road closures at or adjacent to this or any other school. Therefore, construction activities would not adversely affect the operations of nearby schools.

Project construction would not result in substantial adverse physical impacts associated with the provision of new or physically altered schools, the construction of which would cause significant environmental impacts. Therefore, the Project's construction impacts on schools would be less than significant.

(b) Operational Impacts

The Project would construct a 236-room hotel (approximately 158,650 square feet), 308 multi-family residential housing units, and approximately 136,152 square feet of commercial uses, approximately 944,055 square feet of creative office space, 89,577 square feet of restaurant uses, a 62,148-square-foot gym, and 93,617 square feet studio/event/gallery space. The LAUSD has established student generation rates for a variety of uses including residential development (multi-family) as well as other employment generating uses, e.g., retail and office uses.

Based on the LAUSD generation rates, the number of students that could be generated by the Project is illustrated in **Table IV.K.3-2, *Estimated Number of Students Generated by the Project***. As shown, the Project could generate a net increase of 759 elementary school students, 212 middle school students, and 436 high school students for a total net increase of 1,407 school students.

The Project's actual student generation is likely to be less than estimated in the above analysis, which is based on LAUSD generation factors. The LAUSD generation factors do not differentiate between studio units and one- or two-bedroom units. Because a majority of the proposed multi-family residential units are studio apartments (73 units) and one-bedroom apartments (169 units) it is likely that the Project would generate fewer students than estimated. This analysis is also conservative in that it assumes that none of the future Project residents with families would already have students attending the schools that would serve the Project Site. Furthermore, there is potential that a portion of the Project's school-aged children could attend non-LAUSD schools (e.g., private or charter schools), thus reducing attendance at LAUSD schools. For these reasons, the above analysis is considered conservative and likely overestimates the Project's actual potential to generate new students.

The projected number of students generated by the Project are compared against the existing enrollment and capacity in **Table IV.K.3-3, *Existing Capacity and Enrollment of LAUSD Schools Serving the Project Site with the Project***. As shown therein, the Ninth Street Elementary School, Hollenbeck Middle School, and Boyle Heights Zone of Choice schools would have a potential shortage in seats with the Project.

**TABLE IV.K.3-2
ESTIMATED NUMBER OF STUDENTS GENERATED BY THE PROJECT**

Land Use ^{a,b}	Use	Generation Factors	Elementary School	Middle School	High School	Total ^c
Proposed Uses						
Residential Multi-Family	308 units	Elm: 0.2269/unit MS:0.0611/unit HS: 0.1296/unit	70	19	40	129
Retail	136,152 sf	0.610/1,000 sf	45	13	26	84
Creative Office	944,055 sf	1.077/1,000 sf	550	153	316	1,019
Restaurant	89,577 sf	0.610/1,000 sf	30	9	17	56
Hotel	158,647 sf	0.96/1,000 sf	22	7	13	42
Studio Space	93,617 sf	0.610/1,000 sf	31	9	18	58
Gym	62,148 sf	0.610/1,000 sf	21	6	12	39
<i>Total Students Generated by Proposed Uses</i>			769	216	442	1,427
Existing Uses						
Office	11,157 sf	0.610/1,000 sf	7	2	4	13
Dry Storage	32,382 sf	0.013/1,000 sf	1	1	1	3
Freezer/Cooler	161,854 sf	0.013/1,000 sf	2	1	1	4
<i>Total Students Generated by Existing Uses</i>			10	4	6	20
Net Increase (Proposed-Existing)			759	212	436	1,407

NOTE(S):

- ^a Student generation rates for residential uses are based on Table 3 of the LAUSD 2018 Developer Fee Justification Study.
- ^b Student generation for the office, hotel, retail, restaurant, studio space, and gym uses is based on the Neighborhood Shopping Center student generation rates as provided in Table 15 of the LAUSD 2018 Developer Fee Justification Study. Since the Developer Fee Justification Study does not specify grade levels 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). For the existing dry storage and freezer/cooler uses, the Rental Self Storage factor was used.
- ^c Rounded to the nearest whole number.

SOURCE: ESA, 2021.

As previously discussed, the analysis assumes students generated by the Project would attend Ninth Street Elementary School, Hollenbeck Middle School, and schools within the Boyle Heights Zone of Choice. Information regarding LAUSD projections for 2025–2026 (the earliest possible Project buildout year) capacities and enrollments at the local schools are shown in **Table IV.K.3-4, Projected Capacity and Enrollment of LAUSD Schools Serving the Project Site**.

**TABLE IV.K.3-3
EXISTING CAPACITY AND ENROLLMENT OF LAUSD SCHOOLS SERVING THE PROJECT SITE
WITH THE PROJECT**

School	Current Capacity^a	Current Seating Overage/ (Shortage)^a	Project-Generated Students^b	Existing Enrollment with Project^c	Existing Seating Overage/ (Shortage) With Project^d
Ninth Street Elementary School (K–5)	360	73	759	1,046	(686)
Hollenbeck Middle School (6–8)	1,453	83	212	1,582	(129)
SCHOOL CHOICE AREA TOTALS (BOYLE HEIGHTS ZONE OF CHOICE)	3,300	(388)	436	4,124	(824)
S.T.E.M. Academy of Boyle Heights (9–12)	344	—	—	—	—
Theodore Roosevelt Senior High (9–12)	1,817	—	—	—	—
Felicitas and Gonzalo Mendez Senior High (9–12)	1,139	—	—	—	—

NOTE(S):

^a Table IV.K.3-1.

^b Table IV.K.3-2.

^c Existing Enrollment with Project is equal to the Resident Enrollment (as stated in Table IV.K.3-1) plus the Estimated Number of Students Generated by the Project (as stated in Table IV.K.3-2).

^d Existing seating overage (or shortage) with Project is equal to the current capacity minus the Existing Enrollment with Project.

SOURCE: ESA, 2018.

As shown in Table IV.K.3-4, upon buildout, the Project would further contribute to a potential shortage of seats at schools that serve the Project Site. Ninth Street Elementary School would have a potential shortage of 57 seats without the Project; with the Project's contribution of 759 elementary school students, the potential shortage increases to 816 seats. Hollenbeck Middle School would have an excess of 81 seats without the Project; with the Project's contribution of 212 middle school students, Hollenbeck Middle School would have a potential shortage of 131 seats. The Boyle Heights Zone of Choice schools would have an overall potential shortage of 396 seats without the Project; with the Project's contribution of 436 high school students, the overall potential shortage would increase to 832 seats.

TABLE IV.K.3-4
PROJECTED CAPACITY AND ENROLLMENT OF LAUSD SCHOOLS SERVING THE PROJECT SITE WITH THE PROJECT

School	Projected Capacity ^a	Projected Enrollment ^b	Projected Seating Availability/ (Shortage) ^c	Project-Generated Students ^d	Projected Enrollment With Project	Projected Seating Availability/ (Shortage) ^c With Project	Overcrowding Projected in Future ^f
Ninth Street Elementary School (K–5)	324	381	(57)	759	1,140	(816)	Yes
Hollenbeck Middle School (6–8)	1,351	1,270	81	212	1,482	(131)	Yes
Boyle Heights Zone of Choice (9–12) ^e	3,102	3,498	(396)	436	3,934	(832)	Yes
S.T.E.M. Academy of Boyle Heights (9–12)	323	—	—	—	—	—	
Theodore Roosevelt Senior High (9–12)	1,708	—	—	—	—	—	
Felicitas and Gonzalo Mendez Senior High (9–12)	1,071	—	—	—	—	—	

NOTE(S):

- ^a School planning capacity is formulated from a baseline calculation of the number of eligible classrooms after implementing LAUSD operational goals and shifting to a two-semester (single-track) calendar. Per LAUSD correspondence no new school construction is planned and the data in this report already take into account: portable classrooms on site, additions being built onto existing schools, student permits and transfers, programs serving choice areas, and any other operational activities or educational programming affecting the operating capacities and enrollments among LAUSD schools. Includes capacity allocated to by charter co-locations and capacity for magnet programs.
- ^b Projected 5-year total number of students living in the school's attendance areas and who are eligible to attend the school. Includes magnet students.
- ^c Projected seating availability or shortage is equal to the projected capacity minus projected enrollment.
- ^d Number of students generated by the Project is provided in Table IV.K.3-2.
- ^e 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 total school and calculated total capacities and enrollments for school choice areas are reported to show current and projected seating availability/shortage and overcrowding. If any of the school choice area schools is multi-track, then the service area is considered overcrowded.
- ^f A school is considered overcrowded if the school currently has a seating shortage and/or there is currently a seating overage of less than or equal to a "safety margin" of 20 seats.

SOURCE: Rena Perez, letter correspondence dated December 19, 2017; ESA, 2018.

As previously discussed, Project-related student generation is likely to be less than estimated in the above analysis. Additionally, LAUSD continually monitors enrollment numbers at all schools within the District. Seating shortages can be addressed through changes in attendance boundaries and new/expanded school facilities. Additionally, because actual enrollment is based on the number of students enrolled, whether they live inside or outside of the attendance boundary, actual enrollment tends to run lower than the resident enrollment, which is used in the projections above and is based on the number of students living in a school's attendance area. Nonetheless, based on the above, Project implementation could require new or expanded school facilities. Because the location and operational characteristics of any new or expanded school facilities have not yet been identified by LAUSD to specifically serve the Project, it would be speculative to determine how school capacity shortages would be addressed, including where and what type of expanded or new facilities might be provided. Therefore, at such time as the need for expanded or new school facilities are identified by LAUSD, the environmental impacts associated with construction of those facilities would be evaluated by LAUSD under CEQA as a project independent of the Project.

As discussed above, LAUSD's bond program funds improvements and upgrades to LAUSD school facilities. In addition, pursuant to Section 65995 of the California Government Code, the Project applicant would be required to pay fees in accordance with SB 50. Payment of such fees is intended for the general purpose of addressing the construction of new school facilities, whether schools serving the Project in question are at capacity or not. Pursuant to Section 65995(h) of the California Government Code, payment of such fees is deemed full mitigation of a project's development impacts.¹⁷ Project operational impacts to schools would be less than significant.

Project operation would not result in substantial adverse physical impacts associated with the provision of new or physically altered schools, the construction of which would cause significant environmental impacts. Therefore, operational impacts on schools would be less than significant.

(c) Project with the Deck Concept

As stated in Chapter II, *Project Description*, the Applicant seeks to construct a Deck that extends over a portion of the off-site Railway Properties east of the Project Site. Like the Project, the Project with the Deck Concept would involve similar construction labor pools and would not expect construction employees to relocate to this region. Therefore, it is not expected that construction of the Project with the Deck Concept to increase the resident population or generate new students. Thus, the conclusions regarding impact significance presented above are the same and apply to the Project and the Project with

¹⁷ Government Code Section 65995(h) states in part: "The payment or satisfaction of a fee ... specified in Section 65995 ... are hereby deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property ... on the provision of adequate school facilities."

the Deck Concept. As such, impacts under the Project with the Deck Concept would be less than significant.

Impacts associated with school services would be the same under the Project or the Project with the Deck Concept as the Project with the Deck Concept would not include additional housing units or otherwise generate additional demand for public schools. Thus, the conclusions regarding impact significance presented above are the same and apply to the Project and the Project with the Deck Concept. **As such, impacts associated with school services under the Project with the Deck Concept would be less than significant.**

(2) Mitigation Measures

Impacts regarding schools were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding schools were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

(1) Impact Analysis

Chapter III, *Environmental Setting*, of this Draft EIR, identifies 141 related projects in the vicinity of the Project Site. For purposes of this cumulative impact analysis on schools, only those related projects located within the attendance boundaries of the schools serving the Project Site (Ninth Street Elementary School, Hollenbeck Middle School, and schools within the Boyle Heights Zone of Choice) have been considered. Of the 141 related projects identified in Chapter III, 117 are located within the attendance of one or more of the schools serving the Project Site and are included in the estimate of students generated by the related projects.¹⁸

There are schools located in the immediate vicinity of some of the related projects that could be affected by construction of those projects. However, each of the related projects would be required to consult with LAUSD to ensure that their respective construction activities or road/sidewalk closures and detours would not affect Safe Routes to Schools or other operational aspects of nearby schools. Furthermore, these schools are located at such a distance from the Project Site such that the Project would not contribute to a cumulative impact associated with those schools.

¹⁸ The following related projects are located outside of the attendance boundaries of one or more of the schools serving the Project Site: 4, 15, 23, 24, 53, 91, 95, 97, 100, 107, 109, 110, 111, 112, 113, 114, 115, 117, 119, 124, 125, 126, 135, 137, and 138.

Similar to the Project, the number of students anticipated to be generated by related projects was based on the type of development proposed. **Table IV.K.3-5, *Cumulative Student Generation***, shows the number of students projected to be generated by the related projects by the schools within the same attendance boundaries of the schools serving the Project Site. As shown in Table IV.K.3-5, the applicable related projects would potentially generate 7,363 students at Ninth Street Elementary School, 1,218 students at Hollenbeck Middle School, and 3,222 students within the Boyle Heights Zone of Choice. The Project, in conjunction with the related projects, would therefore have the potential to generate 8,122 students at Ninth Street Elementary School, 1,430 students at Hollenbeck Middle School, and 3,029 students within the Boyle Heights Zone of Choice.

**TABLE IV.K.3-5
CUMULATIVE STUDENT GENERATION**

Land Use	Development	Units	Elementary School	Middle School	High School	Total^a
Residential Multi-Family ^b	33,357	units	4,088	306	1,341	5,735
Retail ^c	4,192	ksf	1,381	384	793	2,558
Office ^c	3,009	ksf	1,750	487	1,005	3,242
Industrial ^{c,d}	1,661	ksf	12	4	7	12
Hotel ^{c,e}	958,000	ksf	131	36	76	244
<i>Total Students Generated by Related Projects^a</i>			7,363	1,218	3,222	11,802
<i>Total Students Generated by Proposed Project</i>			759	212	436	1,407
Total Increase (Project + Related Projects)			8,122	1,430	3,658	13,209

NOTE(S):

^a Rounded to the nearest whole number.

^b Student generation rates per household for residential uses Table 3 of the LAUSD 2018 Developer Fee Justification Study: Elementary = 0.2269; Middle School = 0.0611; High School = 0.1296.

^c For the non-residential uses, the student generation rate are based on the student generation rates as provided in Table 15 of the LAUSD 2018 Developer Fee Justification Study. Since the LAUSD Developer 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).

^d As there are no separate generation rates for particular uses (e.g., event facility, parks, other, etc.), the industrial generation rates were used.

^e It is assumed that each hotel room is approximately 500 square feet.

SOURCE: ESA, 2021.

Table IV.K.3-6, *Existing Capacity and Enrollment of LAUSD Schools with Cumulative Development*, and **Table IV.K.3-7, *Projected Capacity and Enrollment of LAUSD Schools with Cumulative Development***, illustrate the cumulative impacts on existing and projected enrollment, capacity, and seating at Ninth Street Elementary School, Hollenbeck Middle School, and the schools within the Boyle Heights Zone of Choice.

**TABLE IV.K.3-6
EXISTING CAPACITY AND ENROLLMENT OF LAUSD SCHOOLS WITH CUMULATIVE
DEVELOPMENT**

School	Current Capacity^a	Current Seating Overage/ (Shortage)^a	Project+ Cumulative Project Generated Students^b	Existing Enrollment with Project + Related Projects^c	Existing Seating Overage/ (Shortage) With Project + Related Projects
Ninth Street Elementary School (K–5)	360	73	8,122	8,409	(8,049)
Hollenbeck Middle School (6–8)	1,453	83	1,430	2,800	(1,347)
Boyle Heights Zone of Choice (9–12)	3,300	(388)	3,658	7,346	(4,046)
S.T.E.M. Academy of Boyle Heights (9–12), 503 South Mott Street, Los Angeles	344	-	-	-	-
Theodore Roosevelt Senior High (9–12), 456 South Mathews Street, Los Angeles	1,817	-	-	-	-
Felicita and Gonzalo Mendez Senior High (9–12), 1200 Plaza Del Sol, Los Angeles	1,139	-	-	-	-

NOTE(S):

^a Table IV.K.3-1.^b Table IV.K.3-5.^c Existing Enrollment with Project and Related Projects is equal to the Resident Enrollment (as stated in Table IV.K.3-1) plus the Estimated Number of Students Generated by the Project and Related Projects (as stated in Table IV.K.3-5).

SOURCE: ESA, 2021.

Based on the existing seating capacity provided by LAUSD and as shown in Table IV.K.3-6, Ninth Street Elementary School would have a potential shortage of 8,049 seats. Sal Castro Middle School would have a potential shortage of 1,347 seats. Belmont High School Zone of Choice schools would have a potential shortage of 4,046 seats. Cumulative development, therefore, has the potential to generate more students than the LAUSD schools that service the Project Site are currently able to accommodate.

**TABLE IV.K.3-7
PROJECTED CAPACITY AND ENROLLMENT OF LAUSD SCHOOLS WITH CUMULATIVE
DEVELOPMENT**

School	Projected Capacity^a	Projected Enrollment^b	Projected Seating Availability/(Shortage)^c	Project + Cumulative Project Generated Students^d	Projected Enrollment With Project + Cumulative Projects	Projected Seating Availability/(Shortage) With Project + Cumulative Projects
Ninth Street Elementary School (K–5)	324	381	(57)	8,122	8,503	(8,179)
Hollenbeck Middle School (6–8)	1,351	1,270	81	1,430	2,700	(1,349)
Boyle Heights Zone of Choice (9–12)	3,102	3,498	(396)	3,658	7,156	(4,054)
S.T.E.M. Academy of Boyle Heights (9–12), 503 South Mott Street, Los Angeles	323	—	—	—	—	—
Theodore Roosevelt Senior High (9–12), 456 South Mathews Street, Los Angeles	1,708	—	—	—	—	—
Felicitas and Gonzalo Mendez Senior High (9–12), 1200 Plaza Del Sol, Los Angeles	1,071	—	—	—	—	—

NOTE(S):

- ^a School planning capacity. Formulated from a baseline calculation of the number of eligible classrooms after implementing LAUSD operational goals and shifting to a two-semester (single-track) calendar. Includes capacity allocated to by charter co-locations and capacity for magnet programs.
- ^b Projected 5-year total number of students living in the school's attendance areas and who are eligible to attend the school. Includes magnet students.
- ^c Projected seating availability/(shortage) is equal to the projected capacity minus projected enrollment.
- ^d Cumulative totals for the number of generated students including the Project are found in Table IV.K.3-5 above.

SOURCE: Rena Perez, letter correspondence dated December 19, 2017; ESA, 2021.

As shown in Table IV.K.3-7, based on the 2025–2026 (earliest Project buildout year) projected seating capacity estimates provided by LAUSD, Ninth Street Elementary School would have a potential shortage of 8,179 seats. Hollenbeck Middle School would have a potential shortage of 1,349 seats. Boyle Heights Zone of Choice schools would have a potential shortage of 4,054 seats. Cumulative development, therefore, has the potential to generate more students than the LAUSD-determined schools are projected to be able to accommodate.

Based on the analysis, the Project, in combination with the related projects, could require new or expanded school facilities. However, LAUSD continually monitors enrollment numbers at all schools within the District, and seating shortages can be addressed through changes in attendance boundaries and new/expanded school facilities. Provided that the location and operational characteristics of any new or expanded school facilities have not yet been identified by LAUSD to specifically serve the Project and the related projects, it would be speculative to determine how school capacity shortages would be addressed, including where and what type of expanded or new facilities may be provided. Therefore, at such time as the need for expanded or new school facilities are identified by LAUSD, the environmental impacts associated with construction of those facilities would be evaluated by LAUSD under CEQA as a project independent of the Project.

As previously discussed, LAUSD has determined that no new schools are planned in the Project Site's attendance boundaries. The calculations of the schools' availability and shortages take into account portable classrooms at each school site, additions to existing schools that are planned or under construction, student permits and transfers, specific educational programs running at the schools, and any other operational activities or educational programming that affect the capacity of and enrollment in LAUSD schools.¹⁹

Similar to the Project, the projected student population increase from cumulative projects is likely to be conservative and overstated. As with the Project, projected student generation is likely to be less than estimated in the above analysis, as it assumes that none of the future residents or employees with families would already have students attending the schools listed above. Additionally, the 6AM project (Related Project No. 129 located at 1206 E. 6th Street), would include an approximately 22,429 square-foot school for 300 students.²⁰ A portion of the school-aged children could attend the future school at the 6AM project or other non-LAUSD schools (e.g., private or charter schools), thus reducing attendance at LAUSD schools. This analysis also does not take into account projects that may not be constructed and occupied within the timeframe analyzed, projects that may be reduced in size, or demolition of existing housing or uses to accommodate the planned new development. Because actual enrollment is based on the number of students enrolled, whether they live inside or outside of the attendance

¹⁹ Rena Perez, letter correspondence dated December 19, 2017.

²⁰ City of Los Angeles Department of City Planning, *6AM Project Initial Study*, February 2017. Accessed November 2018.

boundary, actual enrollment tends to run lower than the number of residential students. In addition, the future LAUSD enrollment estimates already account for at least some growth that may be inclusive of the cumulative projects cited above. For these reasons, the above analysis is considered conservative and likely overestimates the related projects' actual potential to generate new students.

As with the Project, pursuant to Government Code Section 65995, all related projects would be required to pay developer fees under the provisions of SB 50 to address the impacts of new development on school facilities. Payment of such fees is intended for the general purpose of addressing the construction of new school facilities, whether schools serving the Project in question are at capacity or not. Pursuant to Section 65995(h) of the California Government Code, payment of such fees is deemed full mitigation of a project's development impacts. Therefore, with the payment of the developer fees under the provisions of SB 50, the Project and related projects would not result in a substantial adverse physical impact associated with the provision of new or physically altered government 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. **Therefore, the cumulative impacts would be less than significant.**

(a) *Project with the Deck Concept*

Cumulative impacts associated with school services would be the same under the Project or the Project with the Deck Concept as the Deck would not affect demand for public schools. Thus, the conclusions regarding cumulative impact significance presented above are the same and apply to the Project and the Project with the Deck Concept. **As such, cumulative impacts associated with school services under the Project with the Deck Concept would be less than significant.**

(2) Mitigation Measures

Cumulative impacts regarding schools were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts regarding schools were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.