

IV. Environmental Impact Analysis

I.3 Public Services – 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 dated June 22, 2022, which is included in Appendix I-3 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
- Class Size Reduction Kindergarten–University Public Education Facilities Bond Act of 1998
- LAUSD Strategic Plan 2022–2026
- City of Los Angeles General Plan
 - Framework Element

(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 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

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

² State of California, Office of Public School Construction, *School Facility Program Guide*, October 24, 2012.

³ California Government Code Section 65996 and 65997.

⁴ California Education Code Sections 48350, et seq.

(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 2022–2026*

The LAUSD Strategic Plan 2022–26 (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 is set around four goals related to: literacy, numeracy, college and career readiness, and wellness. To effectively achieve these goals, LAUSD has proposed five high-level pillars that represent critical areas to focus on over the next four years. The pillars include: academic excellence, joy and wellness, engagement and collaboration, operational effectiveness, and investing in staff. Each pillar contains several Priorities LAUSD believes are required to successfully support the pillar, as well as Measures of Success and associated targets so LAUSD can gauge their progress in meeting their goals. Identified Strategies are specific actions LAUSD can take at a school site or at the District and community levels to advance these priorities and help LAUSD meet their targets.

⁵ Los Angeles Unified School District, 2020 Developer Justification Study, 2020.

(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 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.I.3-1, Relevant General Plan School Goals, Objectives, and Policies of the Framework Element.**

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 25 other cities, as well as several unincorporated areas of Los Angeles County. Approximately 4.8 million persons live within the boundaries of the District. The LAUSD provides pre-kindergarten through high school (TK–12) education to a total of 420,454 TK–12 students with a total enrollment of 563,083 students when including adult education, enrolled throughout 1,438 schools and centers, including: 19 primary school centers, 434 elementary schools, 77 middle schools, 86 senior high schools, 59 option schools, 67 magnet schools, 30 multi-level schools, 12 special education schools, two home/hospital, 264 K–12 magnet centers (on regular campuses), 221 charter schools, and 167 other schools/centers.⁷ For the 2023–2024 school year, the LAUSD employed 67,845 personnel (excluding substitutes), approximately 38 percent of whom are teachers.⁸ The LAUSD’s Fiscal Year 2023–2024 total budget was approximately \$12.9 billion.⁹ Outside of LAUSD, students may also attend non-LAUSD schools, including public charter schools, magnet schools, pilot schools, and private schools.

⁶ LAUSD, *e-Choices LAUSD Choices Program*, [http https://echoices.lausd.net/magnet#gsc.tab=0](https://echoices.lausd.net/magnet#gsc.tab=0), Accessed October 5, 2022.

⁷ LAUSD, *Fingertip Facts 2023–2024*. Accessed September 14, 2023.

⁸ LAUSD, *Fingertip Facts 2023–2024*.

⁹ LAUSD, *Fingertip Facts 2023–2024*.

**TABLE IV.I.3-1
RELEVANT GENERAL PLAN SCHOOL GOALS, OBJECTIVES, AND POLICIES OF THE
FRAMEWORK ELEMENT**

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

The LAUSD is divided into six local districts (Northeast, Northwest, East, West, Central, and South), with the Project Site located in the Local District Central.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.¹¹

The addition of hundreds of new schools and thousands of new classroom seats makes it necessary to adjust many schools' attendance boundaries. These adjustments will ensure that overcrowded schools get the relief they need, and that the District moves closer to its goal of eliminating the need for students to be bused involuntarily.

¹⁰ LAUSD, Local District East Map, 2022. Accessed March 20, 2022.

¹¹ LAUSD, Boundary Change Information, Facilities Services Division, Boundary Planning Process. Accessed March 20, 2022.

Adjustments in attendance boundaries are intended to relieve overcrowding, to plan for enrollment increases anticipated from new housing, and to address safety issues.¹²

As shown in **Figure IV.I.3-1**, *Designated LAUSD Schools Located in the Vicinity of the Project Site*, the Project Site is located within the attendance boundaries of 9th Street Elementary School, Hollenbeck Middle School, and Belmont Zone of Choice family of High Schools. The Belmont Zone of Choice high schools, serving grades 9–12, include the following:

- Ramone C. Cortines School of Visual & Performing Arts
- Miguel Contreras Learning Complex – Academic Leadership Community
- Miguel Contreras Learning Complex – School of Business and Tourism
- Miguel Contreras Learning Complex – School of Social Justice
- Miguel Contreras Learning Complex – Los Angeles School of Global Studies
- Edward R. Roybal Learning Center
- Belmont High School

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.

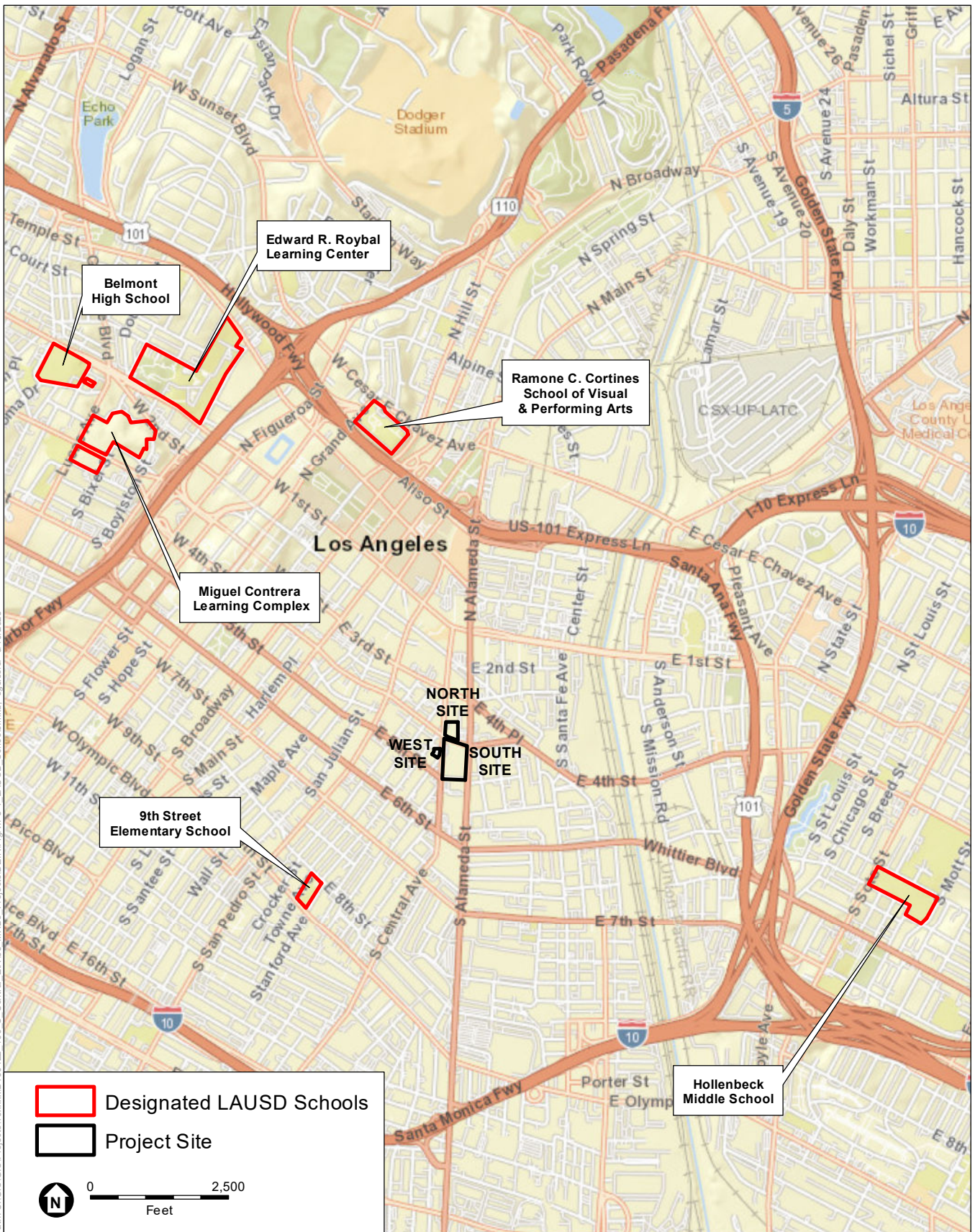
According to LAUSD, available seating capacity is based on resident enrollment (i.e., the number of students living in a school’s attendance area who are eligible to attend the resident school associated with the student’s address) compared to the respective school’s current capacity, regardless of the actual enrollment.¹³ 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.

Table IV.I.3-2, *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.

9th Street Elementary School has a current capacity of 277 students and a resident enrollment of 262, resulting in an estimated available capacity of 35 seats. Hollenbeck Middle School has a current capacity of 1,042 students and a resident enrollment of 1,350 students, resulting in a shortage of 308 seats.

¹² LAUSD, *LAUSD’s Boundary Planning Process*, revised July 2015.

¹³ Vincent Maffei, Director, LAUSD, letter correspondence dated June 22, 2022.



SOURCE:ESRI, ESA, 2023

Fourth & Central Project

Figure IV.I.3-1
Designated LAUSD Schools Located in the Vicinity of the Project Site

**TABLE IV.I.3-2
EXISTING CAPACITY AND ENROLLMENT OF LAUSD SCHOOLS SERVING THE PROJECT SITE**

School Location	Distance/ Direction from Project Site ^a	2020– 2021 Capacity ^b	Resident Enrollment ^c	Actual Enrollment ^d	Current Seating Availability (Shortage) ^e	Over- crowded Status ^f
9th Street Elementary School (K–5)	0.6 mile southwest	277	242	244	35	No
Hollenbeck Middle School (6–8)	1.5 miles southeast	1,042	1,350	818	(308)	Yes
Belmont HS Zone of Choice Schools: ^g	—	6,955	6,649	4,439	306	No

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 "Resident Enrollment" applies to the total number of students living in the school's attendance area and who are eligible to attend the school. It includes magnet students. Schools that are "Schools of Choice" may accept students from outside the actual attendance area. These include all of the Belmont Zone of Choice
- ^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 Seating overage, shortage and overcrowding is calculated and reported for the school of choice area as a whole by LAUSD.
- ^h There are seven schools within one to 1.7 miles from the Project Site as part of the Belmont High School Zone of Choice. These schools include: Edward R. Roybal Learning Center (9–12); Ramon C. Cortines Visual and Performing Arts (9–12); Belmont Sr. Senior High (9–12); Miguel Contreras Academic Leadership Community (9–12); Miguel Contreras School of Business and Tourism (9–12); Miguel Contreras School of Social Justice (9–12); and Miguel Contreras Los Angeles School of Global Studies (9–12).
- SOURCE: Vincent Maffei, Director, LAUSD, letter correspondence dated June 22, 2022, included in Appendix I-3 of this Draft EIR.

As shown in Table IV.1.3-2, based on the combined current capacity of 6,955 students and a combined resident enrollment of 6,649 students, the Belmont Zone of Choice high schools have an estimated combined available capacity of 306 seats. LAUSD has stated that no new schools are planned in the Project Site's attendance boundaries.¹⁴

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 Vincent Maffei, Director, LAUSD, letter correspondence dated June 22, 2022.

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,¹⁵ 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-

¹⁵ LAUSD, *2022 Developer Fee Justification Study*, March 2022.

year intervals and is based on the estimated future resident enrollment (i.e., estimated number of eligible resident students). Current and projected enrollments/capacities use the 2020–2021 school year as a baseline, which reflects the available information provided from LAUSD.¹⁶ 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, Edward 9th Street Elementary School, is located approximately 0.6 mile southwest 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.

¹⁶ Vincent Maffei, Director, LAUSD, letter correspondence dated June 22, 2022.

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 develop ten buildings containing 1,521 multi-family residential units, 411,113 square feet of office floor area, 113,565 square feet of retail or restaurant uses, and a 68-room hotel.

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.I.3-3, *Estimated Number of Students Generated by the Project***. As shown, the Project could generate a net increase of 515 elementary school students, 142 middle school students, and 283 high school students for a total net increase of 940 school students.

This analysis is conservative in that it assumes that none of the future Project residents with families would already have students attending the schools that 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.I.3-4, *Existing Capacity and Enrollment of LAUSD Schools Serving the Project Site with the Project***. As shown therein, the 9th Street Elementary School and Hollenbeck Middle School would have a potential shortage in seats with the Project, while the Belmont Zone of Choice schools would continue to have a seating overage.

As previously discussed, the analysis assumes students generated by the Project would attend 9th Street Elementary School, Hollenbeck Middle School, and seven high schools within the Belmont Zone of Choice. Information regarding LAUSD projections for the service area with the Project and capacities and enrollments at the local schools are shown in Table IV.I.3-4, Existing Capacity and Enrollment of LAUSD Schools Serving the Project Site with the Project.

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

Land Use	Use^{a,b}	Generation Factors	Elementary School Students	Middle School Students	High School Students	Total^c
Proposed Uses						
Residential Multi-Family	1,521 units	Elm: 0.1953/unit MS:0.0538/unit HS: 0.1071/unit	297	82	163	542
Retail/Restaurant	113,565 sf	0.467 students/ksf	29	8	16	53
Office	411,113 sf	0.826/ksf	187	51	102	340
Hotel	74,484 sf	0.195/ksf	8	2	5	15
<i>Total Students Generated by Proposed Uses</i>			521	143	286	950
Existing Uses						
North Site Cold Storage/ Warehouse	167,596 sf	0.010 students/ksf	2	0	1	3
South Site Office	2,871 sf	0.826/ksf	2	1	1	4
South Site Cold Storage/ Warehouse	190,267 sf	0.010 students/ksf	2	0	1	3
<i>Total Students Generated by Existing Uses</i>			6	1	3	10
Net Total (Proposed Less Existing)			515	142	283	940

NOTE(S): ksf= 1,000 square feet

^a Student generation rates for residential uses are based on Table 3 of the LAUSD Developer Fee Justification Study, March 2022.

^b Student generation for the retail/ restaurant uses is based on the Neighborhood Shopping Center student generation rates; student generation for offices is based on Standard Commercial Offices; and student generation for hotel uses is based on Lodging rates as provided in Table 15 of the LAUSD 2022 Developer Fee Justification Study, March 2022. 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 55 percent elementary school, 15 percent middle school, and 30 percent high school). For the existing dry storage and freezer/cooler uses, the Rental Self Storage factor was used.

^c Input totals for elementary, middle and high schools have been rounded based on generation factors to equal total number of students.

SOURCE: ESA, 2022.

**TABLE IV.I.3-4
EXISTING CAPACITY AND ENROLLMENT OF LAUSD SCHOOLS SERVING THE PROJECT SITE
WITH THE PROJECT**

School	Current Capacity ^a	Resident Enrollment ^a	Current Seating Overage/ (Shortage) ^a	Project-Generated Students ^b	Enrollment with Project ^c	Seating Overage/ (Shortage) With Project ^d
9th Street Elementary School (K–5)	277	242	35	515	757	(480)
Hollenbeck Middle School (6–8)	1,042	1350	(308)	142	1,492	(450)
Belmont Zone of Choice Schools (9–12):	6,955	6,649	306	283	6,932	25

NOTE(S):

^a See Table IV.I.3-2^b See Table IV.I.3-3^c Enrollment with Project is equal to the Resident Enrollment plus the Estimated Number of Students Generated by the Project (as stated in Table IV.I.3-2).^d Existing seating overage (or shortage) with Project is equal to the current capacity minus the Enrollment with Project.

SOURCE: Vincent Maffei, Director, LAUSD, letter correspondence dated June 22, 2022; ESA, 2022.

As shown in Table IV.I.3-4, upon buildout, the Project would further contribute to a projected shortage of seats at Hollenbeck Middle School. The Project would also result in a new seating shortage at 9th Street Elementary School. However, the Project's new students would not exceed the seating capacity at the Belmont Zone of Choice Schools, which would have 24 remaining seats available.

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.

Pursuant to SB 50, the Project Applicant would be required to pay development fees for schools to LAUSD prior to issuance of building permits. Under Government Code section 65995 and 65996, 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 LAUSD would offset the potential impact of additional student enrollment at schools serving the Project Site.

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.

(2) Mitigation Measures

Impacts regarding schools were determined to be less than significant. 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 39 related projects in the vicinity of the Project Site. In addition to these 39 related projects, LAUSD's letter dated June 22, 2022 (Appendix I-3 of this Draft EIR) identified an additional mixed-use residential project located at 222 West 2nd Street consisting of 680 du and 10,000 sf of retail uses that could contribute students to schools serving the Project Site. Thus, the residents and employees in this cumulative analysis account for the 39 related projects in Chapter III plus those as part of the 222 West 2nd Street Project. To provide a conservative analysis of impacts, students generated by the related projects are added to the schools serving the Project Site, recognizing that students of some related projects would potentially attend other LAUSD schools.

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 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.

Similar to the Project, the number of students anticipated to be generated by the related projects is based on the type of development proposed. The related projects, not including the Project, would provide 8,340 residential units and generate 12,511 employees. **Table IV.I.3-5, Cumulative Student Generation**, shows the number of students projected to be generated by the related projects, which are added to the number of students generated by the Project. As shown in Table IV.I.3-5, the Project in combination with related projects would potentially generate 3,329 elementary school students, 915 middle school students, and 1,823 high school students for a total of 6,067 students.

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

Land Use	Amount ^a	Generation Factors ^{b,c}	Elementary School Students	Middle School Students	High School Students	Total
Related Projects						
Residential	8,340 du	Elm: 0.1953/unit MS:0.0538/unit HS: 0.1071/unit	1,628	449	893	2,970
Employees ^c	12,511 employees	0.1724 student/emp	1,186	324	647	2,157
Total Students Generated by Related Projects			2,814	773	1,540	5,127
Project Students (Net)			515	142	283	940
Total Increase (Related Projects + Project)			3,329	915	1,823	6,067

NOTE(S):

^a Related projects residential units and employee totals from Table IV.H-5, Total Cumulative Development, in Section IV.H, *Population and Housing*, of this Draft EIR. Table IV.H-5 includes the 39 related projects identified in Chapter 3, Environmental Setting, of this Draft EIR. In addition to these 39 related projects, LAUSD's letter dated June 22, 2022 (Appendix I-3 of this Draft EIR) identified an additional mixed-use residential project located at 222 West 2nd Street consisting of 680 du and 10,000 sf of retail uses that could contribute students to schools serving the Project Site. Thus, the residential dwelling units and employee amounts shown in this Table IV.I.3-5 account for the 39 related projects in Chapter III plus those as part of the 222 West 2nd Street Project.

^b Student generation rates per household for residential uses Table 3 of the LAUSD 2022 Developer Fee Justification Study.

^c For the non-residential uses, the total number of employees from the related projects are used to calculate the number of students. Table 15 of the LAUSD 2022 Developer Fee Justification Study identifies a student per employee rate of 0.1724 for all commercial and industrial land uses. Thus, this rate was applied to the non-residential related project land uses. 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 55 percent elementary school, 15 percent middle school, and 30 percent high school).

SOURCE: ESA, 2023.

As shown in the Project level analysis above, the Project would further contribute to a projected shortage of seats at Hollenbeck Middle School. The Project would also result in a new seating shortage at 9th Street Elementary School. Thus, the addition of students by the related projects would further the seating shortages at 9th Street Elementary School Hollenbeck Middle School. The Belmont Zone of Choice high schools have a seating overage of 306 seats, while the Project and related projects would generate 1,823 students.

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.¹⁷

Similar to the Project, the projected student population increase from related 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. A portion of the school-aged children could attend 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. 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

¹⁷ Vincent Maffei, Director, LAUSD, letter correspondence dated June 22, 2022.

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.**

(2) Mitigation Measures

Cumulative impacts regarding schools were determined to be less than significant. 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.

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