

## **IV. Environmental Impact Analysis**

---

### **I.3 Public Services—Schools**

#### **1. Introduction**

This section of the Draft EIR provides an analysis of the Project's potential impacts on public schools that would serve the Project. Public schools in the City of Los Angeles (City) are under the jurisdiction of the Los Angeles Unified School District (LAUSD). This section evaluates whether the relevant public school facilities have sufficient capacity to accommodate the students projected to be generated by the Project. The analysis is based in part on information provided by LAUSD, which is included in Appendix I of this Draft EIR.

#### **2. Environmental Setting**

##### **a. Regulatory Framework**

###### **(1) Federal**

While public education is generally regulated at state and local levels, the federal government is involved in providing funding for specialized programs (i.e., school meals, Title 1, Special Education, School to Work, and Goals 2000). However, these monies are not used for general educational purposes and are not applicable to the discussion herein.

###### **(2) State**

###### *(a) California Education Code*

LAUSD facilities and services are subject to the rules and regulations of the California Education Code and governance of the State Board of Education. Traditionally, 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 2926 in 1986, allowing school districts to collect impact fees from developers of new residential, commercial, and industrial developments. Development impact fees are also referenced in the 1987 Leroy Greene Lease-Purchase Act, which requires school districts to contribute a matching share of the costs for the construction, modernization, or

reconstruction of school facilities. Subsequent legislation has modified the fees structure and general guidelines.

*(b) Senate Bill 50 and Proposition 1A*

Senate Bill 50, the Leroy F. Greene School Facilities Act of 1998, was signed into law on August 27, 1998. It placed a \$9.2 billion state bond measure (Proposition 1A), which included grants for modernization of existing schools and construction of new schools, on the ballot of the election on November 3, 1998. Proposition 1A was approved by voters, thereby enabling Senate Bill 50 to become fully operative. Under Senate Bill 50, a program was created to fund school facilities largely based on matching funds. Its construction grant provides funding on a 50/50 state and local match basis, while its modernization grant provides funding on a 60/40 basis. Districts that are unable to provide partial or full amounts of the local match requirement may meet financial hardship provisions and are potentially eligible for additional state funding.<sup>1</sup>

In addition, Senate Bill 50 allows governing boards of school districts to establish fees to offset costs associated with school facilities made necessary by new construction. Pursuant to Senate Bill 50, LAUSD collects development fees for new construction within its district boundaries. Currently, LAUSD collects the maximum new school construction facility fee at a rate of \$3.48 per square foot of new residential construction, \$0.56 per square foot of commercial construction, \$0.27 per square foot of self-storage structure, and \$0.37 per square foot of parking structure.<sup>2</sup> Payment of LAUSD's new school construction facility fee is required prior to issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees by a developer serves to fully mitigate all potential project impacts on school facilities to less-than-significant levels.

*(c) Property Tax*

Operation of California's public school districts, including LAUSD, is largely funded by local property tax. While property tax is assessed at a local level, it is the State that allocates tax revenue to each district according to average daily attendance rates.

---

<sup>1</sup> *State of California, Office of Public School Construction, School Facility Program Handbook, July 2007.*

<sup>2</sup> *Los Angeles Department of Building and Safety, Permit Fee Estimate, <http://netinfo.ladbs.org/feecalc.nsf/3950786566dd7fcc88258152007def26?OpenForm>, accessed August 5, 2018.*

### (3) Regional

#### *(a) Los Angeles Unified School District*

As discussed above, the majority of school funding is appropriated by the State. On a regional level, public schools are generally governed by an elected body. LAUSD operates under the policy direction of an elected governing district school board (elected from the local area), as well as by local propositions that directly impact funding of facility construction and maintenance. Pursuant to Senate Bill 50, LAUSD collects developer fees for new construction within its district boundaries.

### (4) Local

As stated 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 Los Angeles County areas in addition to the City of Los Angeles, 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. In addition, while the Central City Community Plan includes policies related to schools, such policies are related to the location, site layout, and architectural design of schools. These policies are directed towards the City and not to private development projects.

#### *(a) LAUSD Strategic Plan 2016–2019<sup>3</sup>*

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 percents of students achieve and graduate. The Strategic identified five main objectives: Build a Solid Foundation for Early Learners; Proficiency for All; 100 Percent Attendance; Parent, Community, and Student Engagement; School Safety. These objectives were supplemented with commitments, such as the following:

- Ensuring that 75 percent of LAUSD early education programs will receive a score of 4 or better as measured by the Quality Rating Improvement System by the 2018–2019 school year.

---

<sup>3</sup> LAUSD, *Strategic Plan 2016–2019*.

- Having quality arts instruction accessible to every child in 100 percent of schools by the 2018–2019 (e.g., music, theater, dance, visual arts, and film/media) school year.
- Increasing the number of bilingual bi-literate high school graduates by 60 percent by 2018–2019 school year.
- Reducing the number of students who are chronically absent by 30 percent by the 2018–2019 school year
- Ensuring that 100 percent of LAUSD parents will be registered and ready to use the Parent Access Support System Portal (PASSport) by the end of the 2018–2019 school year.
- 100 percent of schools will be trained and fully implementing restorative justice practices by the end of the 2019–20120 school year.

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.

## **b. Existing Conditions**

### **(1) Los Angeles Unified School District**

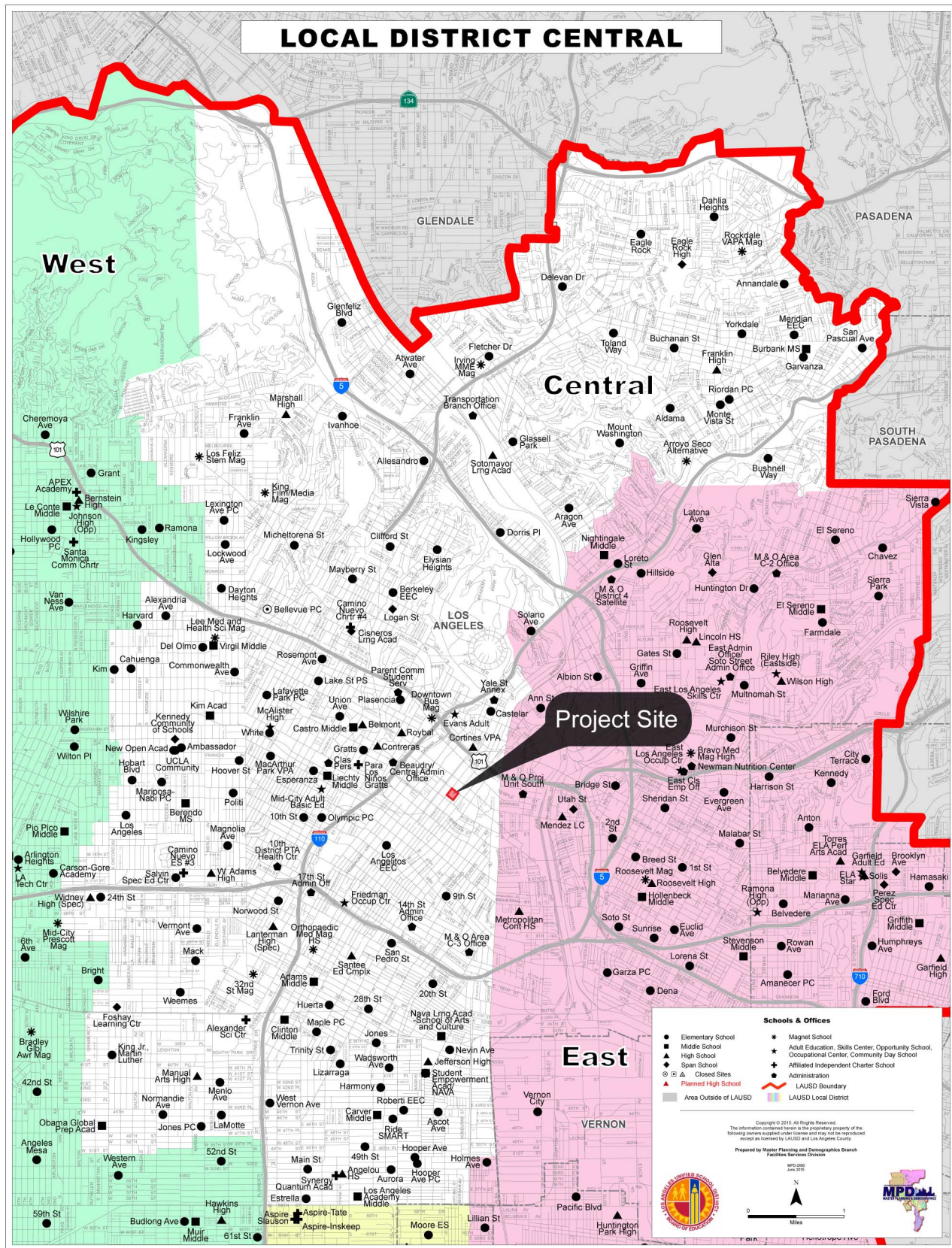
LAUSD serves an area of approximately 710 square miles that includes the City of Los Angeles, all or portions of 26 additional cities, and several unincorporated areas of Los Angeles County.<sup>4</sup> During the 2016–2017 school year, LAUSD provided kindergarten through high school (Grades K–12) education to approximately 664,774 students enrolled throughout 1,302 schools and centers. These include 19 primary school centers, 451 elementary schools, 83 middle schools, 96 senior high schools, 54 option schools, 44 magnet schools, 24 multi-level schools, 12 special education schools, two home/hospital centers, 169 magnet centers on regular campuses (Grades K–12), 228 charter schools, and 120 other schools and centers.<sup>5</sup> LAUSD is divided into six local districts.<sup>6</sup> The Project Site is located in the Central Local District, as shown in Figure IV.I.3-1 on page IV.I.3-5.

<sup>4</sup> LAUSD, *Fingertip Facts 2016–2017*.

<sup>5</sup> LAUSD, *Fingertip Facts 2016–2017*.

<sup>6</sup> LAUSD, *Local District Map*, <http://achieve.lausd.net/domain/34>, accessed April 5, 2018.





**Figure IV.I.3-1**  
Los Angeles Unified School District  
Central Local District Boundary Map

As discussed above, California Senate Bill 50 provides funding for the construction of new school facilities. Other major statewide funding sources for school facilities include Proposition 47 and 55. Proposition 47 is a \$13.2 billion bond approved in November 2002 and provides \$11.4 billion for K–12 public school facilities. Proposition 55 is a \$12.3 billion bond approved in March 2004 and provides \$10 billion to address overcrowding and accommodate future growth in K–12 public schools. LAUSD's voter-approved Bond Program is currently valued at \$27.5 billion. LAUSD's Facilities Services Division is managing a \$25.3 billion program to build new schools to reduce overcrowding and modernize existing campuses throughout LAUSD. The primary goal of the bond program had been to reduce overcrowding by providing students with the opportunity to attend a neighborhood school operating on a traditional, two-semester calendar. As LAUSD nears achievement of this goal, LAUSD's Facilities Services Division continues with the development and prioritization of future capital projects, including school sites with the most critical physical conditions.<sup>7</sup>

*(a) Public Schools in the Project Vicinity*

As shown in Figure IV.I.3-2 on page IV.I.3-7, the public schools that serve students in the Project Site vicinity include 9th Street Elementary, Sal Castro Middle School, and high schools in the Belmont Zone of Choice.<sup>8</sup> These schools currently operate under a single-track calendar in which instruction generally begins in mid-August and continues through early June. Table IV.I.3-1 on page IV.I.3-8 presents the academic year capacity, enrollment, and seating shortages/overages for each of these schools during the most recent school year (2015–2016) for which data are available. All data presented in the table already account for the use of 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 affect the capacities and enrollments of the schools.<sup>9</sup> According to LAUSD, the calculation of available capacity (seating overage/shortage) is based on the resident enrollment compared to the respective school's capacity. 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. Actual enrollment is defined as the number of students

<sup>7</sup> LAUSD, Facilities Services Division, FSD Bond Program, [www.laschools.org/new-site/](http://www.laschools.org/new-site/), accessed August 5, 2018.

<sup>8</sup> Belmont Zone of Choice high schools include: Contreras Learning Center—Academic Leadership Community, Los Angeles Teacher Preparatory High School (closed for school year 2016–2017), Contreras Learning Center—School of Business and Tourism, Contreras Learning Center—School of Social Justice, Contreras Learning Center—Los Angeles School of Global Studies, Ramon C. Cortines School of Visual & Performing Arts, Belmont High School, and Edward R. Roybal Learning Center.

<sup>9</sup> Letter from Rena Perez, Director of Master Planning and Demographics, LAUSD Facilities Services Division, dated March 29, 2017. See Appendix I of this Draft EIR.





**Figure IV.I.3-2**  
Schools Serving the Project Vicinity



**Table IV.I.3-1  
Existing (2015–2016) Enrollment and Capacity of LAUSD Schools that Serve the Project Site**

<b>School Name</b>	<b>Current Capacity<sup>a</sup></b>	<b>Resident Enrollment<sup>b</sup></b>	<b>Actual Enrollment<sup>c</sup></b>	<b>Current Seating Overage/ (Shortage)<sup>d</sup></b>	<b>Overcrowded Now?<sup>e</sup></b>
9th Street Elementary	328	185	302	143	<b>No</b>
Sal Castro Middle School	596	409	343	187	<b>No</b>
Belmont Zone of Choice High Schools <sup>f</sup>	6,230	5,708	5,656	522	<b>No</b>
<p><sup>a</sup> 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.</p> <p><sup>b</sup> Total number of students living in the school's attendance area, who are eligible to attend the school. Includes magnet students.</p> <p><sup>c</sup> Number of students actually attending the school currently, including magnet students.</p> <p><sup>d</sup> Seating overage or (shortage) based on capacity minus resident enrollment.</p> <p><sup>e</sup> The school is considered to be overcrowded or without available capacity if any of these conditions exist: (1) the school operates on a multi-track calendar; (2) there is a seating shortage; or (3) there is a seating overage of less than or equal to a safety margin of 30 seats.</p> <p><sup>f</sup> Belmont Zone of Choice high schools include: Contreras Learning Center—Academic Leadership Community, Los Angeles Teacher Preparatory High School (closed for school year 2016–2017), Contreras Learning Center—School of Business and Tourism, Contreras Learning Center—School of Social Justice, Contreras Learning Center—Los Angeles School of Global Studies, Ramon C. Cortines School of Visual &amp; Performing Arts, Belmont High School, and Edward R. Roybal Learning Center.</p> <p>Source: Letter from Rena Perez, Director of Master Planning and Demographics, LAUSD Facilities Services Division, dated March 29, 2017. See Appendix I of this Draft EIR.</p>					

actually attending the school currently, including magnet students. 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 a seating shortage; or (3) there is currently a capacity overage of less than or equal to a safety margin of 30 seats.

LAUSD also projects the future capacity of its schools for the next five years.<sup>10</sup> Table IV.I.3-2 on page IV.I.3-9 shows LAUSD's projected capacity at each of the schools serving the Project Site vicinity, which are further discussed below.

<sup>10</sup> As described in Section II, Project Description, of this Draft EIR, Project construction is anticipated to be completed in 2025. However, LAUSD projects future enrollment and capacity in five-year increments (Footnote continued on next page)



**Table IV.I.3-2**  
**Projected 2020–2021 Enrollment and Capacity of LAUSD Schools that Serve the Project Site**

<b>School Name</b>	<b>Projected Capacity<sup>a</sup></b>	<b>Projected Resident Enrollment<sup>b</sup></b>	<b>Projected Seating Overage/ (Shortage)<sup>c</sup></b>	<b>Overcrowding Projected in Future?<sup>d</sup></b>
9th Street Elementary	295	226	69	<b>No</b>
Sal Castro Middle School	554	353	201	<b>No</b>
Belmont Zone of Choice High Schools <sup>e</sup>	5,856	4,833	1,023	<b>No</b>
<p><sup>a</sup> <i>Schools planning capacity. Formulated from a baseline calculation of the number of eligible classrooms after implementing LAUSD operational goals and shifting to a 2-semester (1-track) calendar. This includes the capacity currently used by charter co-locations and for magnet programs.</i></p> <p><sup>b</sup> <i>Projected five-year total number of students living in the school's attendance area and who are eligible to attend the school. Includes magnet students.</i></p> <p><sup>c</sup> <i>According to LAUSD, projected seating overage/(shortage) is projected capacity minus projected resident enrollment.</i></p> <p><sup>d</sup> <i>The school is projected to be overcrowded or without available capacity if any of these conditions exist: (1) the school remains on a multi-track calendar; (2) there will be a capacity shortage in the future; or (3) there will be a capacity overage of less than or equal to a safety margin of 30 seats.</i></p> <p><sup>e</sup> <i>Belmont Zone of Choice high schools include: Contreras Learning Center—Academic Leadership Community, Los Angeles Teacher Preparatory High School (closed for school year 2016–2017), Contreras Learning Center—School of Business and Tourism, Contreras Learning Center—School of Social Justice, Contreras Learning Center—Los Angeles School of Global Studies, Ramon C. Cortines School of Visual &amp; Performing Arts, Belmont High School, Edward R. Roybal Learning Center.</i></p> <p><i>Source: Letter from Rena Perez, Director of Master Planning and Demographics, LAUSD Facilities Services Division, dated March 29, 2017. See Appendix I of this Draft EIR.</i></p>				

*(i) 9th Street Elementary*

9th Street Elementary is located at 835 Stanford Avenue, approximately 1.09 miles south of the Project Site, and offers instruction for Grades K–5 on a single-track calendar. During the 2015–2016 academic year, 9th Street Elementary had a total capacity for 328 students, a residential enrollment of 185 students, and an actual enrollment of 302 students. Based on five-year projections, the school is projected to have capacity for 295 students and a residential enrollment of 226 students, resulting in an excess of 69 seats for the 2020–2021 academic year. Therefore, 9th Street Elementary is not considered overcrowded under existing or projected future conditions.

*based on the most recent school year for which data is available, which is currently for the 2015–2016 school year. Therefore, projected future enrollment and capacity data considered in this analysis are for the 2020–2021 school year.*

*(ii) Sal Castro Middle School*

Sal Castro Middle School is located at 1575 West 2nd Street, approximately 1.13 miles northwest of the Project Site, and offers instruction for Grades 6–8 on a single-track calendar. During the 2015–2016 academic year, Sal Castro Middle School had a total capacity for 596 students, a residential enrollment of 409 students, and an actual enrollment of 343 students. Based on five-year projections, the school is projected to have capacity for 554 students and a residential enrollment of 353 students, resulting in an excess of 201 seats for the 2020–2021 academic year. Therefore, Sal Castro Middle School is not considered overcrowded under existing or projected future conditions.

*(iii) Belmont Zone of Choice High Schools*

In its vision to provide every student with a quality education and environment, LAUSD has implemented a strategy called Zones of Choice to increase the number of personalized educational options available to resident high school students.<sup>11</sup> Zones of Choice are geographic areas that feature different high school options offering college preparatory education and career preparation. The Belmont Zone of Choice is located in LAUSD's Central Local District.

Students living in the Belmont Zone of Choice area may apply to any of the Belmont Zone of Choice high schools, which include Contreras Learning Center—Academic Leadership Community, Los Angeles Teacher Preparatory High School (closed for school year 2016–2017), Contreras Learning Center—School of Business and Tourism, Contreras Learning Center—School of Social Justice, Contreras Learning Center—Los Angeles School of Global Studies, Ramon C. Cortines School of Visual & Performing Arts, Belmont High School, and Edward R. Roybal Learning Center. All of the above schools are within the vicinity of the Project Site and offer instruction for Grades 9–12 on a single-track calendar.

During the 2015–2016 academic year, Belmont Zone of Choice high schools had a total capacity for 6,230 students, a residential enrollment of 5,708 students, and an actual enrollment of 5,656 students. Therefore, Belmont Zone of Choice high schools are not considered overcrowded under existing conditions. Based on LAUSD's five-year projections, the Belmont Zone of Choice high schools are projected to have a capacity for 5,856 students and a residential enrollment of 4,833 students, resulting in an excess capacity of 1,023 seats for the 2020–2021 academic year. Therefore, Belmont Zone of Choice high schools are not projected to experience overcrowding in the future.

---

<sup>11</sup> LAUSD, *About Zones of Choice*, <http://achieve.lausd.net/zoc>, accessed August 5, 2018.

*(b) Open Enrollment Policy*

The open enrollment policy is a state-mandated policy that enables students anywhere in the LAUSD service area to apply to any regular, grade-appropriate LAUSD school with designated open enrollment seats.<sup>12</sup> Open enrollment transfers are issued on a space-available basis only. No student living in a particular school's attendance area will be displaced by a student requesting an open enrollment transfer. Open enrollment seats are granted through an application process that is completed before the school year begins.

*(c) 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 by 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 the LAUSD service area. If a charter school has more new applications than it can accommodate, it must hold a lottery.<sup>13</sup> LAUSD has over 274 independent and affiliated charter schools within its jurisdiction, serving over 138,000 students in Grades K–12.<sup>14</sup> The charter schools in the Project vicinity include University Prep Value High School, USC Hybrid High School, Jardin De La Infancia, Para Los Ninos Charter Middle School, Para Los Ninos Charter School, Metro Charter, Alliance Dr. Olga Mohan High School, Para Los Ninos—Evelyn Gratts Primary Center, Camino Nuevo Charter Academy—Burlington, and Equitas Academy #3.<sup>15</sup>

Based on information provided by LAUSD, most charter schools do not have residential attendance boundaries, and enrollment data for charter schools are not regularly reported to LAUSD. Thus, the enrollment projections and capacity analyses provided by LAUSD are not inclusive of all charter schools.<sup>16</sup>

---

<sup>12</sup> LAUSD, *K–12 Open Enrollment: Fact Sheet*, <http://achieve.lausd.net/Page/10999>, accessed August 5, 2018.

<sup>13</sup> LAUSD Charter Schools Division, *About Charter Schools*, <http://achieve.lausd.net/Page/1816>, accessed August 5, 2018.

<sup>14</sup> LAUSD Charter Schools Division, *About Charter Schools*, <http://achieve.lausd.net/Page/1816>, accessed August 5, 2018.

<sup>15</sup> California Charter Schools Association, *Find a Charter School*, [www.ccsa.org/schools/](http://www.ccsa.org/schools/), accessed August 5, 2018.

<sup>16</sup> Email communication, Gwenn Godek, LAUSD OEHS, Contract Professional/CEQA Advisor, January 25, 2017.



*(d) Magnet Schools*

The option to attend “magnet” programs is also available to students living within LAUSD’s service boundaries. Magnet programs provide specialized curricula 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 225 magnet programs within LAUSD.<sup>17</sup> In the Project vicinity, schools offering magnet programs include the Downtown Magnets High School, Orthopaedic Hospital Medical Magnet High School, John Adams Middle School, 32nd Street/USC Visual & Performing Arts Magnet K–5 LAUSD/USC Media Arts & Engineering Magnet 6–12, Virgil Middle School, and Manual Arts High School.<sup>18</sup> Since enrollment is application-based for magnet schools, overcrowding is not determined for magnet schools.

*(e) Pilot Schools*

Pilot schools are a network of public schools that have autonomy over budgets, staffing, governance, curriculum and assessment, and the school calendar.<sup>19</sup> Pilot schools were first established in February 2007 when a Memorandum of Understanding was ratified by LAUSD and United Teachers Los Angeles, a union of professionals representing 33,000 public school teachers and health and human services professionals in Los Angeles.<sup>20,21</sup> From this event, Belmont Pilot Schools were created and implemented with a specific focus on developing new, innovative schools to relieve overcrowding at Belmont High School.<sup>22</sup> Currently, there are 48 pilot schools within LAUSD.<sup>23</sup>

*(f) Proposed New Public Schools*

LAUSD’s Facilities Services Division is managing a \$25.6 billion program to build new schools to reduce overcrowding and modernize existing campuses throughout

<sup>17</sup> LAUSD, *Choices 2016–2017, Magnet Programs*.

<sup>18</sup> LAUSD, *Student Integration Services, e-choices, Magnet School Selection Tool*, <http://echoices.lausd.net/Magnet/programinfo.aspx>, accessed August 5, 2018.

<sup>19</sup> LAUSD, *Overview, What is a Pilot School*, <https://achieve.lausd.net/Page/2841>, accessed August 5, 2018.

<sup>20</sup> LAUSD, *Los Angeles Pilot Schools Manual, 2016–2017*.

<sup>21</sup> *United Teachers Los Angeles, Contact Us*, [www.utla.net/contact-us](http://www.utla.net/contact-us), accessed August 5, 2018.

<sup>22</sup> LAUSD, *Los Angeles Pilot Schools Manual, 2016–2017*.

<sup>23</sup> LAUSD, *2017–18 Los Angeles Pilot Schools Manual, Appendix E: 2017–18 List of Pilot Schools*.

LAUSD's service area.<sup>24</sup> To date, more than 600 new projects providing more than 170,000 new seats have been constructed, and more than 19,600 school modernization projects have completed construction to provide upgraded facilities.<sup>25</sup> According to LAUSD, there are no new proposed public schools planned in the Project vicinity.<sup>26</sup>

## (2) Private Schools in the Project Vicinity

In addition to publicly available schools, private schools can potentially serve as alternatives to LAUSD schools. Within one mile of the Project Site, there are five private schools. Three schools offer Pre-K and K, one school offers Grades K–12, and one school offers Grades 6–12.<sup>27</sup> Private facilities generally have smaller student populations and higher teacher to student ratios than their public counterparts. This information is presented for factual purposes only, as it does not directly relate to current and future enrollment capacity levels at LAUSD schools before or after implementation of the Project.

# 3. Project Impacts

## a. Methodology

Operation-related impacts on schools were quantitatively analyzed to assess the ability of LAUSD to accommodate the student population that would be generated by the Project. The anticipated number of students that would be generated by the Project was calculated by applying the rates from the LAUSD 2016 Developer Fee Justification Study.<sup>28</sup>

This analysis focuses on public schools that would serve the Project Site. This analysis does not take into account 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 or participate in home schooling. In any case, students who opt to enroll within districts other than their home districts are required to obtain inter-district transfer permits to ensure that existing facilities of the

<sup>24</sup> LAUSD, Facilities Services Division, Bond Program, <http://laschools.org/new-site/>, accessed August 5, 2018.

<sup>25</sup> LAUSD, Facilities Services Division, Bond Program, <http://laschools.org/new-site/>, accessed August 5, 2018.

<sup>26</sup> Letter from Rena Perez, Director of Master Planning and Demographics, LAUSD Facilities Services Division, dated March 29, 2017. See Appendix I of this Draft EIR.

<sup>27</sup> Private School Review, Schools Within One Mile of 232 West 2nd Street, [www.privateschoolreview.com](http://www.privateschoolreview.com), accessed August 5, 2018.

<sup>28</sup> LAUSD, Level 1—Developer Fee Justification Study for Los Angeles Unified School District, March 2017.

incoming schools would not suffer impacts due to the additional enrollment. Furthermore, this analysis is conservative as it does not account for the fact that there are several public school options, such as charter schools, magnet schools, and private schools, in the Project Site vicinity that could also serve Project residents. This analysis also does not account for the Project's future residents who may already reside in the school attendance boundaries and would move to the Project Site.<sup>29</sup>

## b. Thresholds of Significance

### (1) State CEQA Guidelines Appendix G

In accordance with State CEQA Guidelines Appendix G (Appendix G), 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 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.***

### (2) 2006 L.A. CEQA Thresholds Guide

The *L.A. CEQA Thresholds Guide* states that the determination of the significance of impacts shall be made on a case-by-case basis, considering the following criteria to evaluate schools:

- The population increase resulting from the 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 buildout compared to the expected level of service available, and to 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

<sup>29</sup> *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 are not inclusive of charter schools.*



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 the LAUSD).

In assessing impacts related to schools in this section, the City will use Appendix G as the thresholds of significance. The criteria identified above from the *L.A. CEQA Thresholds Guide* will be used where applicable and relevant to assist in analyzing the Appendix G threshold questions. In addition, consistent with LAUSD methodology, school capacity for the purposes of this analysis is defined as the number of students that can be accommodated at a school based on resident enrollment.

## c. Analysis of Project Impacts

### (1) Project Design Features

No specific Project design features are proposed with regard to schools.

### (2) Relevant Project Characteristics

As discussed in Section II, Project Description, of this Draft EIR, the Project involves the development of a 30-story mixed-use building consisting of 107 residential units (comprising an estimated 137,347 square feet), plus 7,200 square feet of ground level commercial uses, and 534,044 square feet of office uses in Downtown Los Angeles. The proposed residences would include 12 studios, 42 one-bedroom units, 40 two-bedroom units, and 13 three-bedroom units.

### (3) Project Impacts

***Threshold (a): Would the Project 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?***

#### *(a) Construction*

The Project would generate part-time and full-time jobs associated with construction throughout the construction period. However, due to the employment patterns of construction workers in Southern California and 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. **Therefore, the construction-related employment generated by the Project would not result in a notable increase in the residential population or a corresponding demand for schools in the vicinity of the Project Site. Impacts to school facilities during Project construction would be less than significant.**

*(b) Operation*

The Project would directly generate students through the construction of 107 new residential dwelling units. In addition, the Project's commercial and office components could generate students since employees of these uses could relocate to the Project vicinity. As shown in Table IV.I.3-3 on page IV.I.3-17, using applicable LAUSD student generation rates for the Project's land uses, the Project is estimated to generate 569 students, including 309 elementary school students (Grades K–5), 84 middle school students (Grades 6–8), and 176 high school students (Grades 9–12). It is noted that these estimates do not account for the students of future Project employees who may already live within the district and thus may already attend the analyzed schools and/or other schools in the Project area. Nonetheless, as there are no students currently residing on the Project Site, the Project's student generation would result in an increase in students attending Project area schools.

It should be noted that the number of Project-generated students who could attend LAUSD schools would likely be less than the estimates presented above since this analysis does not include LAUSD options that allow students to enroll at other LAUSD schools located farther away from their home attendance area, nor does the analysis account for students who may enroll in private schools or participate in home-schooling. In addition, this analysis does not account for future Project residents who may already reside in the Project's school attendance boundaries. Other LAUSD options, some of which are discussed above, that may be available to Project-generated students include the following:

- Open enrollment that enables students anywhere within LAUSD to apply to any regular, grade-appropriate LAUSD school with designated open enrollment seats;
- Magnet schools and centers (such as Downtown Magnets High School, Orthopaedic Hospital Medical Magnet High School, John Adams Middle School, 32nd Street/USC Visual & Performing Arts Magnet K–5 LAUSD/USC Media Arts & Engineering Magnet 6–12, Virgil Middle School, and Manual Arts High School), which are open to qualified LAUSD students;

**Table IV.I.3-3  
Estimated Number of Students Generated by the Project**

Land Use	Units	Students Generated <sup>a</sup>			
		9th Street Elementary (K–5)	Sal Castro Middle School (6–8)	Belmont Zone of Choice High Schools (9–12) <sup>b</sup>	Total
Proposed					
Residential: Studio, One-Bedroom, Two-Bedroom, and Three-Bedroom Units	107 du	25	7	14	46
Commercial Retail	7,200 sf	3	1	2	6
Office	534,044 sf	281	76	160	517
Project Student Generation		309	84	176	569

*du = dwelling units*

*sf = square feet*

*Totals have been rounded to the nearest whole number and may not sum due to rounding.*

<sup>a</sup> Based on student generation factors provided in Level 1—Developer Fee Justification Study for Los Angeles Unified School District, Table 15, March 2017. The LAUSD 2016 Developer Fee Justification Study provides student generation rates for Grades K–6, 7–8, and 9–12. For residential uses, the following student generation rates were used: 0.2269 student per household for Grades K–6, 0.0611 student per household for Grades 7–8, and 0.1296 student per household for Grades 9–12. For 9th Street Elementary School (Grades K–5), the student generation rate listed for Grades K–6 is used. For Sal Castro Middle School (Grades 6–8), the student generation rate listed for Grades 7–8 is used. For commercial retail uses, the student generation rate of 0.610 student per 1,000 square feet for “Neighborhood Shopping Center” is applied. For office uses, the student generation rate of 0.969 students per 1,000 square feet for “Large High Rise Commercial Office” is applied. Since the LAUSD 2016 Developer Fee Justification Study does not specify the grade levels of students generated by non-residential land uses, such students 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 54.3 percent for elementary school, 14.6 percent for middle school, and 31.0 percent for high school). It is noted that these student generation rates are averages throughout the LAUSD district and may not accurately reflect the Project’s characteristics, which by virtue of its proximity to transit (i.e., the on-site Metro station, currently under construction), will allow employees to travel greater distances without the need to move closer to their jobs on-site. Accordingly, the student generation estimates are considered conservative.

<sup>b</sup> Belmont Zone of Choice high schools include: Contreras Learning Center—Academic Leadership Community, Los Angeles Teacher Preparatory High School (closed for school year 2016–2017), Contreras Learning Center—School of Business and Tourism, Contreras Learning Center—School of Social Justice, Contreras Learning Center—Los Angeles School of Global Studies, Ramon C. Cortines School of Visual & Performing Arts, Belmont High School, Edward R. Roybal Learning Center.

Source: Eyestone Environmental, 2018.

- The Permits With Transportation Program, 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.<sup>30</sup> LAUSD provides transportation to all students enrolled in the Permits With Transportation Program regardless of where they live within the LAUSD service area;

- 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;
- Sibling permits that enable students to enroll in a school where a sibling is already enrolled; and
- Child care 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.

Based on existing enrollment and capacity data from LAUSD, 9th Street Elementary School would not have adequate capacity to accommodate the new students generated by the Project under existing conditions. At 9th Street Elementary School, there would be a shortage of 198 seats (i.e., the existing excess capacity of 143 seats minus the Project-generated 341 students). Both Sal Castro Middle School and the Belmont Zone of Choice high schools would have excess capacity. Sal Castro Middle School would have an excess of 94 seats (i.e., the existing excess capacity of 187 seats minus the Project-generated 93 students), and Belmont Zone of Choice high schools would have excess capacity of 327 seats (i.e., the existing excess capacity of 522 seats minus the Project-generated 195 students). It is noted that the Project is not anticipated to be operational until 2025.

In considering projected future capacity data from LAUSD, similar to existing conditions, 9th Street Elementary School would not have adequate capacity to accommodate the new students generated by the Project under future conditions projected for the 2020–2021 academic year. At 9th Street Elementary School, there would be a shortage of 272 seats (i.e., the future excess capacity of 69 seats minus the Project-generated 341 students). Both Sal Castro Middle School and the Belmont Zone of Choice high schools would have excess capacity. Sal Castro Middle School would have an excess of 108 seats (i.e., the future excess capacity of 201 seats minus the Project-generated 93 students), and Belmont Zone of Choice high schools would have excess capacity of 828 seats (i.e., the future excess capacity of 1,023 seats minus the Project-generated 195 students) under projected future conditions. As previously noted, the Project is not anticipated to be operational until 2025.

---

<sup>30</sup> A feeder pattern is the linkage from elementary school, middle school, and high school.

Pursuant to Senate Bill 50, the Project Applicant or its successor would be required to pay development fees to 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 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, and mitigation measures would not be required.**

## 4. Cumulative Impacts

Cumulative growth in the Project vicinity includes specific known development projects, as well as general ambient growth projected to occur, as described in Section III, Environmental Setting, of this Draft EIR. As identified therein, a total of 173 related projects are located in the vicinity of the Project Site. Much of this growth is anticipated by the City and will be incorporated into the Central City Community Plan Update, known as the DTLA 2040 Plan, which the Department of City Planning is in the process of preparing (refer to Section IV.F, Land Use, of this Draft EIR for further discussion). According to the DTLA 2040 projections, an additional approximately 125,000 people, 70,000 housing units, and 55,000 jobs will be added to the Downtown area by the year 2040.<sup>31</sup>

Of the 173 related projects located in the Project Site vicinity, 160 related projects are located within the attendance boundaries of 9th Street Elementary School, Sal Castro Middle School, and/or Belmont Zone of Choice high schools. These 160 related projects plus other future development projects in the Community Plan area combined with the Project have the potential to cumulatively generate new students who would attend the aforementioned schools. The identified 160 related projects are considered in this cumulative analysis.

As shown in Table IV.I.3-4 on page IV.I.3-20, over the course of several years the related projects located within the relevant school attendance boundaries could potentially generate a total of 20,069 new students at the analyzed schools, including 12,844 9th Street Elementary School students, 602 Sal Castro Middle School students, and 6,623 Belmont Zone of Choice high school students, based on the student generation rates

---

<sup>31</sup> Growth projections current as of December 2018. Source: City of Los Angeles, DTLA 2040, About This Project, [www.dtl2040.org/](http://www.dtl2040.org/), accessed December 6, 2018.

**Table IV.I.3-4  
Related Projects with Cumulative School Impacts**

No. <sup>a</sup>	Project Name and Location	Land Use <sup>b</sup>	Size	Students Generated <sup>c,d</sup>			Total
				9th St. Elem. School	Sal Castro Middle School	Sal Castro Middle School	
1	Blossom Plaza 900 North Broadway	Condominium	223 du	0	0	0	0
		Retail	25,000 glsf	0	0	0	0
		Restaurant	15,000 gsf	0	0	0	0
2	Ava Little Tokyo 200 South Los Angeles St.	Condominium	570 du	0	0	0	0
		Apartment	280 du	0	0	0	0
		Retail	50,000 glsf	0	0	0	0
3	454 East Commercial Street	Bus Maintenance Facility <sup>f</sup>	2 ac	0	0	0	0
4	Tenten Wilshire Expansion 1027 West Wilshire Blvd.	Condominium	356 du	0	0	47	47
		Retail	5,000 glsf	0	0	1	1
		Office	5,000 gsf	0	0	2	2
5	Vibiana Lofts 225 South Los Angeles St.	Condominium	300 du	0	0	0	0
		Retail	3,400 glsf	0	0	0	0
6	215 West 9th Street	Condominium	210 du	48	0	28	76
		Retail	9,000 glsf	3	0	2	5
7	1101 North Main Street	Condominium	318 du	0	0	42	42
8	Amacon Project 1133 S. Hope St.	Apartment	208 du	0	0	27	27
		Retail	5,069 glsf	0	0	1	1
9	Megatoys 905 E. 2nd St.	Condominium	320 du	—	—	—	—
		Retail	18,716 glsf	—	—	—	—
10	Park Fifth 427 W. 5th St., 437 S. Hill St.	Condominium	660 du	0	0	86	86
		Restaurant	13,742 glsf	0	0	3	3
11	1115 South Hill Street	Condominium	172 du	0	0	23	23
		Restaurant	6,850 gsf	0	0	2	2
12	1102 West 6th Street	Apartment	649 du	0	0	85	85
		Retail	39,996 glsf	0	0	8	8
13	1130 West Wilshire Boulevard	Office	88,224 gsf	0	0	30	30
		Day Care <sup>g</sup>	20 stu	0	0	0	0
		High-Turnover Restaurant	248 gsf	0	0	1	1
		Quality Restaurant	5,375 gsf	0	0	2	2
14	Metro Bus Maintenance & Operations 920 N. Vignes St.	Bus Maintenance Facility	N/A	0	0	0	0
15	Glass Tower Project 1050 S. Grand Ave.	Condominium	151 du	0	0	20	20
		Retail	3,472 glsf	0	0	1	1
		Restaurant	2,200 gsf	0	0	1	1
16	Embassy Tower 848 S. Grand Ave.	Condominium	420 du	0	0	55	55
		Retail	38,500 glsf	0	0	8	8

**Table IV.I.3-4 (Continued)**  
**Related Projects with Cumulative School Impacts**

No. <sup>a</sup>	Project Name and Location	Land Use <sup>b</sup>	Size	Students Generated <sup>c,d</sup>			Total
				9th St. Elem. School	Sal Castro Middle School	Sal Castro Middle School	
17	Beverly + Lucas Project 1430 West Beverly Blvd.	Apartment	243 du	0	15	32	47
		Retail	3,500 glsf	0	0	1	1
18	Wilshire Grand Redevelopment Project 900 W. Wilshire Blvd.	Hotel (889 rooms)	577,850 sf	0	0	46	46
		General Office	369,300 gsf	0	0	124	124
		Retail/Restaurant	34,776 gsf	0	0	7	7
19	Barlow Hospital Replacement & MP 2000 Stadium Way	Condominium	800 du	0	0	104	104
		Hospital <sup>h</sup>	56 beds	0	0	0	0
		Retail	15,000 glsf	0	0	3	3
20	1435 West 3rd Street	Apartment	122 du	0	8	16	24
		Retail	3,500 glsf	0	1	1	2
21	Grand Avenue Project 225 S. Grand Ave.	Condominium	1,432 du	0	88	186	274
		Apartment	357 du	0	22	47	69
		Office	681,000 gsf	0	108	228	336
		Retail	449,000 glsf	0	41	86	127
22	Metropolis Mixed-Use 899 S. Francisco St.	Hotel (480 rooms)	312,000 sf	0	0	25	25
		Condominium	836 du	0	0	109	109
		Retail/Restaurant	46,000 gsf	0	0	9	9
		Office	988,225 gsf	0	0	331	331
23	LA Civic Center Office 150 N. Los Angeles St.	Office	712,500 gsf	0	0	239	239
		Retail	35,000 glsf	0	0	7	7
		Child Care	2,500 gsf	0	0	1	1
24	1300 South Hope Street	Apartment	419 du	96	0	0	96
		Retail	42,200 glsf	14	0	0	14
25	928 South Broadway	Apartment	662 du	151	0	86	237
		Live/Work	11 du	3	0	2	5
		Retail	47,000 glsf	16	0	9	25
		Office	34,824 gsf	21	0	12	33
26	1200 South Grand Avenue	Apartment	640 du	146	0	83	229
		Retail	45,000 glsf	15	0	9	24
27	Valencia Project 1501 W. Wilshire Blvd.	Apartment	218 du	0	0	29	29
		Retail	6,000 glsf	0	0	2	2
		Restaurant	1,500 gsf	0	0	1	1
28	1329 West 7th Street	Apartment	87 du	0	0	12	12
29	534–552 South Main Street, 539–547 South Los Angeles Street	Apartment	160 du	37	0	21	58
		Retail	18,000 glsf	6	0	11	17
		Restaurant	3,500 gsf	2	0	1	3
		Fast-Food Restaurant	3,500 gsf	2	0	1	3

**Table IV.I.3-4 (Continued)**  
**Related Projects with Cumulative School Impacts**

No. <sup>a</sup>	Project Name and Location	Land Use <sup>b</sup>	Size	Students Generated <sup>c,d</sup>			Total
				9th St. Elem. School	Sal Castro Middle School	Sal Castro Middle School	
30	840 South Olive Street	Condominium	303 du	69	0	40	109
		Restaurant	9,680 gsf	4	0	2	6
		Retail	1,500 glsf	1	0	1	2
31	770 South Grand Avenue	Apartment	700 du	0	0	0	0
		Retail	27,000 glsf	0	0	0	0
		Restaurant	5,000 gsf	0	0	0	0
32	Santa Fe Freight Yard Redevelopment 950 E. 3rd St.	Apartment	635 du	—	—	—	—
		Retail/Restaurant	30,062 glsf	—	—	—	—
		School	532 stu	—	—	—	—
33	201 South Broadway	Mixed Office/Retail/Restaurant <sup>i</sup>	27,675 gsf	17	5	10	32
34	The City Market 1057 S. San Pedro St.	Office	549,141 gsf	322	0	0	322
		Retail	224,862 glsf	75	0	0	75
		Cinema <sup>l</sup>	744 seats	0	0	0	0
		Apartment	877 du	199	0	0	199
		Hotel (210 rooms)	136,500 sf	19	0	0	19
		Condominium	68 du	16	0	0	16
35	400 South Broadway	Apartment	450 du	103	0	59	162
		Retail	6,904 glsf	3	0	2	5
		Bar	5,000 gsf	2	0	1	3
36	1001 S. Olive St.	Apartment	225 du	52	0	30	82
		Restaurant	5,000 gsf	2	0	1	3
37	Camden Arts Mixed-Use 1525 E. Industrial St.	Apartment	328 du	75	0	0	75
		Retail	6,400 glsf	3	0	0	3
		Restaurant	5,700 gsf	2	0	0	2
		Office	27,300 gsf	16	0	0	16
38	920 South Hill Street	Apartment	239 du	55	0	31	86
		Retail	5,400 glsf	2	0	2	4
39	955 South Broadway	Apartment	163 du	37	0	22	59
		Retail	6,406 glsf	3	0	2	5
40	801 South Olive Street	Apartment	363 du	83	0	48	131
		Restaurant	7,500 gsf	3	0	2	5
		Retail	2,500 glsf	1	0	1	2
41	1212 South Flower Street	Condominium	730 du	0	0	95	95
		Retail	7,873 glsf	0	0	2	2
42	820 South Olive Street; 825 South Hill Street	Apartment	589 du	134	0	77	211
		Retail	4,500 glsf	2	0	1	3

**Table IV.I.3-4 (Continued)**  
**Related Projects with Cumulative School Impacts**

No. <sup>a</sup>	Project Name and Location	Land Use <sup>b</sup>	Size	Students Generated <sup>c,d</sup>			Total
				9th St. Elem. School	Sal Castro Middle School	Sal Castro Middle School	
43	Sunset Everett Mixed-Use 1185 W. Sunset Blvd.	Apartment	214 du	0	14	28	42
		Condominium	6 du	0	1	1	2
		Single-Family Residential	6 du	0	1	1	2
44	601 South Main Street	Condominium	452 du	0	28	0	28
		Retail	25,000 glsf	0	3	0	3
45	2051 East 7th Street	Apartment	320 du	73	0	0	73
		Retail	15,000 glsf	5	0	0	5
		Restaurant	5,000 gsf	2	0	0	2
46	Herald Examiner 1111 S. Broadway & 156 W. 11th St. & 1201 S. Main St.	Apartment	391 du	0	24	0	24
		Retail	49,000 glsf	0	5	0	5
		Office	39,725 gsf	0	7	0	7
47	South Park Site 1 1120 S. Grand Ave.	Apartment	666 du	0	41	0	41
		Retail	20,600 glsf	0	2	0	2
48	South Park Site 4 1230 S. Olive St.	Apartment	360 du	0	22	0	22
		Retail	6,400 glsf	0	1	0	1
49	1247 South Grand Avenue	Apartment	115 du	0	8	0	8
		Retail	4,610 glsf	0	1	0	1
50	Legal Aid Foundation of Los Angeles 1550 W. 8th St.	Office	33,957 gsf	0	0	12	12
51	Variety Arts Mixed-Use 940 S. Figueroa St.	Theater <sup>f</sup>	1,942 seats	0	0	0	0
		Restaurant	10,056 gsf	0	0	2	2
		Bar	5,119 gsf	0	0	1	1
52	La Plaza Cultura Village 527 N. Spring St.	Apartment	345 du	0	0	45	45
		Retail	23,000 glsf	0	0	5	5
		Specialty Retail	21,000 glsf	0	0	4	4
		Restaurant	11,000 gsf	0	0	3	3
53	1036 South Grand Avenue	Restaurant	7,149 gsf	0	1	0	1
54	Coca Cola 963 E. 4th St.	Office	78,600 gsf	—	—	—	—
		Retail	25,000 glsf	—	—	—	—
		Restaurant	20,000 gsf	—	—	—	—
55	1335 West 1st Street	Apartment	102 du	0	7	14	21
		Retail	3,463 glsf	0	1	1	2
56	459 South Hartford Avenue	Apartment	101 du	0	0	14	14
57	401 North Boylston Street	Apartment	121 du	0	8	16	24
58	1800 East 7th Street	Apartment	122 du	28	0	0	28
		Restaurant	4,605 gsf	2	0	0	2
		Retail	3,245 glsf	2	0	0	2



**Table IV.I.3-4 (Continued)**  
**Related Projects with Cumulative School Impacts**

No. <sup>a</sup>	Project Name and Location	Land Use <sup>b</sup>	Size	Students Generated <sup>c,d</sup>			Total
				9th St. Elem. School	Sal Castro Middle School	Sal Castro Middle School	
59	1150 West Wilshire Boulevard	Apartment	80 du	0	0	11	11
		Restaurant	4,589 gsf	0	0	1	1
60	737 South Spring Street	Apartment	320 du	73	0	42	115
		Pharmacy/Drug Store	25,000 gsf	9	0	5	14
61	520 South Mateo Street	Apartment	600 du	137	0	0	137
		Office	30,000 gsf	18	0	0	18
		Retail	15,000 glsf	5	0	0	5
		Restaurant	15,000 gsf	5	0	0	5
62	1218 West Ingraham Street	Apartment	80 du	0	0	11	11
63	Palmetto & Mateo 555 S. Mateo St.	Retail	153,000 glsf	51	0	0	51
64	732 South Spring Street	Apartment	400 du	91	0	52	143
		Pharmacy/Drug Store	15,000 gsf	5	0	3	8
65	340 South Hill Street	Apartment	428 du	98	0	56	154
		Restaurant	2,894 gsf	1	0	1	2
66	1145 West 7th Street	Condominium	241 du	0	0	32	32
		Retail	7,291 glsf	0	0	2	2
67	540 South Santa Fe Avenue	Office	89,825 gsf	53	0	0	53
68	360 South Alameda Street	Apartment	55 du	—	—	—	—
		Office	6,300 gsf	—	—	—	—
		Restaurant	2,500 gsf	—	—	—	—
69	118 South Astronaut Ellison S Onizuka Street	Apartment	77 du	18	0	10	28
70	Kaiser Permanente Los Angeles Medical Center Expansion 765 W. College St.	Medical Office	100,000 gsf	0	0	30	30
		Inpatient Facility <sup>h</sup>	62 beds	0	0	0	0
71	Stadium Way & Chavez Ravine Apartments 959 E. Stadium Way	Apartment	158 du	—	—	—	—
72	700 West Cesar Chavez Avenue	Apartment	299 du	0	0	39	39
		Retail	8,000 glsf	0	0	2	2
73	Clinic at 7th & Wall 649 S. Wall St.	Medical Office	66 emp	9	0	0	9
		Assisted Living <sup>h</sup>	55 beds	0	0	0	0
74	Metro Emergency Security Operations Center 410 N. Center St.	Office	110,000 gsf	—	—	—	—
75	500 South Mateo Street	Restaurant	12,882 gsf	5	0	0	5

**Table IV.I.3-4 (Continued)**  
**Related Projects with Cumulative School Impacts**

No. <sup>a</sup>	Project Name and Location	Land Use <sup>b</sup>	Size	Students Generated <sup>c,d</sup>			Total
				9th St. Elem. School	Sal Castro Middle School	Sal Castro Middle School	
76	Medallion Phase 2 300 S. Main St.	Apartment	471 du	107	0	62	169
		Retail	5,190 glsf	2	0	1	3
		Restaurant	27,780 gsf	10	0	6	16
77	Alexan South Broadway 850 S. Hill St.	Apartment	300 du	69	0	39	108
		Retail	3,500 glsf	2	0	1	3
		Restaurant	3,500 gsf	2	0	1	3
78	340 North Patton Street	Apartment	44 du	0	3	6	9
79	Alameda Hotel 400 S. Alameda St.	Hotel (66 rooms)	42,900 sf	6	0	0	6
		Restaurant	2,130 gsf	1	0	0	1
		Retail	840 glsf	1	0	0	1
80	Apex II 700 W. 9th St.	Apartment	341 du	0	0	45	45
		Retail	11,687 glsf	0	0	3	3
81	649 South Olive Street	Hotel (241 rooms)	156,650 sf	22	0	13	35
82	Sapphire Mixed-Use 1111 W. 6th St.	Apartment	362 du	0	0	47	47
		Retail	25,805 glsf	0	0	5	5
83	Grand Residences 1233 S. Grand Ave.	Condominium	161 du	37	0	21	58
		Restaurant	3,000 gsf	1	0	1	2
84	675 South Bixel Street	Hotel (126 rooms)	81,900 sf	12	0	7	19
		Apartment	422 du	96	0	55	151
		Retail	4,874 glsf	2	0	1	3
85	740 South Hartford Avenue	Apartment	80 du	0	0	11	11
86	Lifan Tower 1235 W. 7th St.	Condominium	304 du	0	0	40	40
		Retail	5,699 glsf	0	0	2	2
87	940 South Hill Street	Apartment	232 du	53	0	31	84
		Restaurant	14,000 glsf	5	0	3	8
88	1322 Linwood Avenue	Apartment	84 du	0	0	11	11
89	1340 South Olive Street	Apartment	156 du	36	0	0	36
		Retail	5,000 glsf	2	0	0	2
		Restaurant	10,000 gsf	4	0	0	4
90	1334 South Flower Street	Apartment	188 du	—	—	—	—
		Retail/Restaurant	10,096 glsf	—	—	—	—
91	929 East 2nd Street	Retail	37,974 glsf	—	—	—	—
		Other	71,078 gsf	—	—	—	—
92	633 South Spring Street	Hotel (176 rooms)	114,400 sf	16	0	10	26
		Restaurant	8,430 gsf	3	0	2	5
		Bar	5,290 gsf	2	0	2	4
93	Luxe Hotel 1020 S. Figueroa St.	Hotel (300 rooms)	195,000 sf	0	0	16	16
		Condominium	435 du	0	0	57	57
		Retail	58,959 glsf	0	0	12	12

**Table IV.I.3-4 (Continued)**  
**Related Projects with Cumulative School Impacts**

No. <sup>a</sup>	Project Name and Location	Land Use <sup>b</sup>	Size	Students Generated <sup>c,d</sup>			Total
				9th St. Elem. School	Sal Castro Middle School	Sal Castro Middle School	
94	1200 South Figueroa Street	Residential	648 du	0	0	84	84
		Restaurant	20,000 gsf	0	0	4	4
		Retail	28,000 gsf	0	0	6	6
95	701 South Hill Street	Apartment	124 du	29	0	17	46
		Retail	8,500 gsf	3	0	2	5
96	525 South Spring Street	Apartment	360 du	82	0	47	129
		Retail	9,400 gsf	4	0	2	6
97	Case Hotel 1106 S. Broadway	Hotel (151 rooms)	98,150 sf	14	0	8	22
98	425 West 11th Street	Office	500 emp	0	0	0	0
99	Freehand Hotel 416 W. 8th St.	Hotel (200 rooms)	130,000 sf	18	0	11	29
100	The Bloc 700 S. Flower St.	Office	737,710 gsf	0	0	247	247
		Retail	260,000 gsf	0	0	50	50
		Restaurant	50,000 gsf	0	0	10	10
		Theater <sup>f</sup>	800 seats	0	0	0	0
101	1728 West 7th Street	Restaurant/Bar	13,100 gsf	0	0	3	3
102	Olympic Tower 815 W. Olympic Blvd.	Hotel (373 rooms)	242,450 sf	0	0	20	20
		Retail	65,074 gsf	0	0	13	13
		Condominium	374 du	0	0	49	49
		Office	33,498 gsf	0	0	12	12
		Conference Center	10,801 gsf	0	0	4	4
103	LA Gateway Project 1025 W. Olympic Blvd.	Apartment	1,367 du	0	0	178	178
		Restaurant	20,000 gsf	0	0	4	4
		Retail	20,000 gsf	0	0	4	4
104	Oceanwide Plaza 1101 S. Flower St.	Condominium	504 du	0	0	66	66
		Hotel (183 rooms)	118,950 sf	0	0	10	10
		Retail	120,583 gsf	0	0	23	23
		Restaurant	46,000 gsf	0	0	9	9
105	Los Angeles Sports and Entertainment District Figueroa St. & 11th St.	Office	601,800 gsf	0	0	202	202
		Convention Center	250,000 gsf	0	0	84	84
106	Hall of Justice 211 W. Temple St.	Government Building	1,600 emp	0	0	0	0
		Parking Structure	1,000 spc	0	0	0	0
107	418 South Spring Street	High-Rise Condominium	96 du	0	0	0	0
		Hotel	122 rm	0	0	0	0
		Retail	10,000 gsf	0	0	0	0
		Health Club	2,000 gsf	0	0	0	0
		Bar	3,500 gsf	0	0	0	0

**Table IV.I.3-4 (Continued)**  
**Related Projects with Cumulative School Impacts**

No. <sup>a</sup>	Project Name and Location	Land Use <sup>b</sup>	Size	Students Generated <sup>c,d</sup>			Total
				9th St. Elem. School	Sal Castro Middle School	Sal Castro Middle School	
108	1013 North Everett Street	Apartment	49 du	0	3	7	10
109	708 North Hill Street	Apartment	162 du	0	0	21	21
		Retail	5,000 glsf	0	0	1	1
110	211 West Alpine Street	Apartment	122 du	0	0	16	16
		Retail	7,500 glsf	0	0	2	2
111	130 South Beaudry Avenue	Apartment	220 du	0	14	29	43
112	College Station Mixed-Use 129 W. College St., 924 N. Spring St.	Condominium	770 du	0	0	100	100
		Retail	51,592 glsf	0	0	10	10
113	Urban View Lots 495 S. Hartford Ave.	Apartment	218 du	50	14	29	93
114	1316 West Court Street	Apartment	60 du	0	0	8	8
115	8th & Figueroa Mixed-Use 744 S. Figueroa St.	Apartment	438 du	0	0	57	57
		Retail	7,500 glsf	0	0	2	2
116	1201 North Broadway	Apartment	118 du	—	—	—	—
		Office	8,800 gsf	—	—	—	—
117	1346–1354 West Court Street	Apartment	43 du	0	3	6	9
118	433 South Main Street	Condominium	161 du	0	0	21	21
		Mixed-Use <sup>i</sup>	6,900 gsf	0	0	3	3
119	Downtown LA Hotel 926 W. James M. Woods Blvd.	Hotel (247 rooms)	160,550 sf	0	0	13	13
120	JMF Tower 333 W. 5th St.	Condominium	100 du	0	0	13	13
		Hotel (200 rooms)	130,000 sf	0	0	11	11
		Restaurant	27,500 gsf	0	0	6	6
121	Times Mirror Square 202 W. 1st St.	Apartment	1,127 du	—	—	—	—
		Office	285,088 gsf	—	—	—	—
		Supermarket	50,000 gsf	—	—	—	—
		Restaurant	75,589 gsf	—	—	—	—
122	888 South Hope Street	Apartment	526 du	120	0	69	189
123	Sofia Los Angeles 1106 W. 6th St.	Apartment	606 du	0	0	79	79
		Retail	25,000 glsf	0	0	5	5
124	Ferrante 1000 W. Temple St.	Apartment	1,500 du	0	92	195	287
		Retail	30,000 glsf	0	3	6	9

**Table IV.I.3-4 (Continued)**  
**Related Projects with Cumulative School Impacts**

No. <sup>a</sup>	Project Name and Location	Land Use <sup>b</sup>	Size	Students Generated <sup>c,d</sup>			Total
				9th St. Elem. School	Sal Castro Middle School	Sal Castro Middle School	
125	640 South Alameda Street, 1206 East 6th Street	Apartment	1,305 du	297	0	0	297
		Condominium	431 du	98	0	0	98
		Hotel (412 rooms)	267,800 sf	37	0	0	37
		Office	253,514 gsf	149	0	0	149
		Retail	127,609 glsf	43	0	0	43
		School <sup>k</sup>	29,316 gsf	0	0	0	0
		Art Space	22,429 gsf	14	0	0	14
126	1300 South Figueroa Street	Hotel	1,024 rm	—	—	—	—
127	Budokan of Los Angeles 237–249 S. Los Angeles St.	Sports Center	63,000 gsf	37	0	22	59
128	King's Arch 537 S. Broadway	Office	45,000 gsf	27	0	16	43
129	Title Insurance Building 433 S. Spring St.	Office	320,000 gsf	188	0	107	295
130	Subway Terminal Retail 417 S. Hill St.	Retail/Office <sup>i</sup>	130,000 glsf	77	0	44	121
131	405 South Hewitt Street	Office	255,500 gsf	150	0	0	150
		Retail	4,970 glsf	2	0	0	2
		Restaurant	9,940 gsf	4	0	0	4
132	333 South Alameda Street	Apartment	994 du	226	0	129	355
		Retail	99,300 glsf	33	0	19	52
133	The San Pedro Towers 600–628 S. San Pedro St, 611–615 S. Crocker St, 518–522 E. 6th St.	Affordable Housing	298 du	68	0	0	68
		Manager Apartment	5 du	2	0	0	2
		Retail	3,136 glsf	2	0	0	2
		Office	16,773 gsf	10	0	0	10
134	1000 South Hill Street	Apartment	498 du	113	0	65	178
		Retail	8,707 glsf	3	0	2	5
135	1011 North Broadway	Hotel (92 rooms)	59,800 sf	0	0	5	5
136	1018 West Ingraham Street	Apartment	43 du	0	0	6	6
		Retail	7,400 glsf	0	0	2	2
137	1100 East 5th Street	Apartment	220 du	50	0	0	50
		Office	20,021 gsf	12	0	0	12
		Restaurant	19,609 gsf	7	0	0	7
		Retail	9,250 glsf	4	0	0	4
138	1100 South Main Street	Apartment	379 du	86	0	0	86
		Retail	25,810 glsf	9	0	0	9
139	1625 West Palo Alto Street	Hotel (88 rooms)	57,200 sf	0	3	5	8

**Table IV.I.3-4 (Continued)**  
**Related Projects with Cumulative School Impacts**

No. <sup>a</sup>	Project Name and Location	Land Use <sup>b</sup>	Size	Students Generated <sup>c,d</sup>			Total
				9th St. Elem. School	Sal Castro Middle School	Sal Castro Middle School	
140	1219 South Hope Street	Hotel (75 rooms)	48,750 sf	0	0	4	4
		Restaurant	7,700 gsf	0	0	2	2
141	1246 West Court Street	Apartment	54 du	0	4	7	11
142	1307 West 7th Street	Apartment	76 du	0	0	10	10
		Retail	6,035 gsf	0	0	2	2
143	1322 West Maryland Street	Apartment	47 du	0	0	7	7
		Retail	760 gsf	0	0	1	1
144	1323 South Grand Avenue	Apartment	284 du	65	0	0	65
		Retail	6,300 gsf	3	0	0	3
145	656 South Stanford Avenue	Apartment	82 du	19	0	0	19
146	The Weingart Towers 554–562 S. San Pedro St., 555–561 S. Crocker St.	Affordable Housing	378 du	86	0	49	135
		Manager Apartment	4 du	1	0	1	2
		Retail	1,758 gsf	1	0	1	2
		Office	4,410 gsf	3	0	2	5
		Dining Room/Flex Space <sup>i</sup>	5,932 gsf	4	0	2	6
147	601 South Central Avenue	Apartment	236 du	54	0	0	54
		Retail	12,000 gsf	4	0	0	4
148	640 South Santa Fe Avenue	Office	107,127 gsf	63	0	0	63
149	641 South Imperial Street	Apartment	140 du	32	0	0	32
		Office	14,749 gsf	9	0	0	9
150	643 North Spring Street	Apartment	203 du	0	0	27	27
		Retail	21,049 gsf	0	0	4	4
151	668 South Alameda Street	Apartment	475 du	108	0	0	108
		Office	43,000 gsf	26	0	0	26
		Retail	9,000 gsf	3	0	0	3
		Supermarket	15,000 gsf	5	0	0	5
		Restaurant	17,000 gsf	6	0	0	6
152	676 South Mateo Street	Apartment	172 du	40	0	0	40
		Retail	23,025 gsf	8	0	0	8
153	755 South Los Angeles Street	Office	60,243 gsf	36	0	0	36
		Retail	16,694 gsf	6	0	0	6
		Restaurant	26,959 gsf	9	0	0	9
154	940 East 4th Street	Apartment	93 du	22	0	0	22
		Retail	14,248 gsf	5	0	0	5
		Office	6,000 gsf	4	0	0	4
155	1410 South Flower Street	Apartment	152 du	—	—	—	—
		Retail	1,184 gsf	—	—	—	—



**Table IV.I.3-4 (Continued)**  
**Related Projects with Cumulative School Impacts**

No. <sup>a</sup>	Project Name and Location	Land Use <sup>b</sup>	Size	Students Generated <sup>c,d</sup>			Total
				9th St. Elem. School	Sal Castro Middle School	Sal Castro Middle School	
156	845 South Olive Street	Apartment	208 du	48	0	27	75
		Retail	810 glsf	1	0	1	2
		Restaurant	1,620 gsf	1	0	1	2
157	330 South Alameda Street	Apartment	186 du	—	—	—	—
		Office	10,415 gsf	—	—	—	—
		Retail	11,925 glsf	—	—	—	—
158	527 South Colyton Street	Condominium	310 du	71	0	0	71
		Retail	11,375 glsf	4	0	0	4
		Art Production Space	11,736 gsf	7	0	0	7
159	Fashion District Residences 212–230 E. 7th St., 701–739 S. Maple Ave.	Apartment	452 du	103	0	0	103
		Retail	6,802 glsf	3	0	0	3
		Restaurant	6,802 gsf	3	0	0	3
160	755 South Wall Street	Apartment	323 du	74	0	0	74
		Retail	4,400 glsf	2	0	0	2
		Event Space <sup>l</sup>	125 per	16	0	0	16
		Office	53,200 gsf	32	0	0	32
		Restaurant	4,420 gsf	2	0	0	2
161	1101 East 5th Street, 445–457 S. Colyton St.	Live/Work	129 du	30	0	0	30
		Retail	26,979 glsf	9	0	0	9
		Restaurant	31,719 gsf	11	0	0	11
		Hotel (113 rooms)	73,450 sf	11	0	0	11
		Art Uses	13,771 gsf	9	0	0	9
162	1045 South Olive Street	Apartment	800 du	182	0	104	286
163	Figueroa Centre 913 S. Figueroa St.	Hotel (220 rooms)	143,000 sf	0	0	12	12
		Apartment	200 du	0	0	26	26
		Retail	94,080 glsf	0	0	18	18
164	8th, Grand & Hope Tower 754 S. Hope St.	Apartment	409 du	0	0	54	54
		Retail	7,329 sf	0	0	2	2
165	1340 South Hill Street	Apartment	233 du	53	0	0	53
166	670 Mesquit Street	Apartment	308 du	70	0	0	70
		Hotel (236 rooms)	153,400 sf	22	0	0	22
		Office	944,055 gsf	553	0	0	553
		Retail	79,240 glsf	27	0	0	27
		Restaurant	89,576 gsf	30	0	0	30
		Event Space	93,617 gsf	55	0	0	55
		Gym	62,148 gsf	21	0	0	21
		Grocery	56,912 gsf	19	0	0	19
167	1030–1380 N. Broadway, 1251 N. Spring St.	Apartment	920 du	0	0	120	120
		Retail	21,406 glsf	0	0	5	5

**Table IV.I.3-4 (Continued)**  
**Related Projects with Cumulative School Impacts**

No. <sup>a</sup>	Project Name and Location	Land Use <sup>b</sup>	Size	Students Generated <sup>c,d</sup>			Total
				9th St. Elem. School	Sal Castro Middle School	Sal Castro Middle School	
168	Alameda Square 777 S. Alameda St.	Office	1,300,000 gsf	761	0	0	761
		Retail	250,000 glsf	83	0	0	83
169	1248 South Figueroa Street	Hotel (1,162 rooms)	755,300 sf	0	0	60	60
		Restaurant	13,145 gsf	0	0	3	3
170	215 West 14th Street	Apartment	154 du	35	0	0	35
		Retail	10,700 glsf	4	0	0	4
171	1745 East 7th Street	Apartment	57 du	13	0	0	13
		Retail	6,000 glsf	2	0	0	2
172	354 South Spring Street	Apartment	212 du	49	0	28	77
		Restaurant	15,280 gsf	6	0	3	9
173	Alameda District Plan	Residential	22 du	5	0	0	5
		Office	7,443,200 gsf	4,356	0	0	4,356
		Retail	645,000 glsf	214	0	0	214
		Hotel (750 rooms)	487,500 sf	68	0	0	68
		Restaurant	20,000 gsf	7	0	0	7
		Museum	70,000 gsf	41	0	0	41
Related Projects Student Generation				12,844	602	6,623	20,069
Project Student Generation				309	84	176	569
Total Student Generation for Related Projects and Project				13,153	686	6,799	20,638

*ac = acres*

*du = dwelling units*

*glsf = gross leasable square feet*

*gsf = gross square feet*

*spc = spaces*


*stu = students*

*emp = employees*

*per = persons*

*N/A = no generation rate available*

*Totals calculated have been rounded up to the nearest whole number and may not sum due to rounding.*

 = This indicates that the related project is not located within the attendance boundaries of at least one of the schools servicing the Project Site (i.e., 9th Street Elementary School, Sal Castro Middle School, and Belmont Zone of Choice High Schools).

<sup>a</sup> Related Project Nos. 1, 2, 5, 14, 31, 98, 106, and 107 have been built and are operational. As these related projects have already been accounted for in existing conditions, student generation was not calculated. Additionally, many of the related projects are located in the attendance boundaries of one or two of the analyzed schools, but not all of the Project's assigned resident schools and thus may not list student generation data for all schools. These projects would generate students at other LAUSD schools that are not analyzed herein. Accordingly, impacts at the analyzed schools are overstated.

<sup>b</sup> For hotel uses, a square footage rate of 650 square feet per room is applied. Source: deRoos, J. A. (2011).

**Table IV.I.3-4 (Continued)**  
**Related Projects with Cumulative School Impacts**

No. <sup>a</sup>	Project Name and Location	Land Use <sup>b</sup>	Size	Students Generated <sup>c,d</sup>			Total
				9th St. Elem. School	Sal Castro Middle School	Sal Castro Middle School	
	<i>Planning and programming a hotel [Electronic version]. Retrieved December 13, 2016, from Cornell University, School of Hospitality Administration site, <a href="http://scholarship.sha.cornell.edu/articles/310/">http://scholarship.sha.cornell.edu/articles/310/</a>.</i>						
c	<i>Based on student generation factors provided in the Level 1--Developer Fee Justification Study for Los Angeles Unified School District, Table 15 March 2017. The LAUSD 2016 Developer Fee Justification Study provides student generation rates for Grades K–6, 7–8, and 9–12. For residential uses of the related projects, the following student generation rates were used: 0.2269 student per household for Grades K–6, 0.0611 student per household for Grades 7–8, and 0.1296 student per household for Grades 9–12. For 9th Street Elementary School (Grades K–5), the student generation rate listed for Grades K–6 is used. For Sal Castro Middle School (Grades 6–8), the student generation rate listed for Grades 7–8 is used. For commercial uses, the student generation rate of 0.610 student per 1,000 square feet for “Neighborhood Shopping Center” is applied. For office uses, the student generation rate of 1.077 students per 1,000 square feet for “Standard Commercial Office” is applied. This rate is considered conservative as many of the related projects with office uses will consist of high-rise development, and high-rise commercial office uses typically generate fewer students. For medical office uses, the student generation rate of 0.960 student per 1,000 square feet is applied. For hotel uses, the student generation rate of 0.254 student per 1,000 square feet is applied. For all non-residential land uses, the student generation rate of 0.2249 student per employee is applied. Since the LAUSD 2016 Developer Fee Justification Study does not specify the grade levels of students that are generated from non-residential land uses, such students 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 54.3 percent for elementary school, 14.6 percent for middle school, and 31.0 percent for high school).</i>						
d	<i>The LAUSD 2016 Developer Fee Justification Study does not provide student generation factors for restaurant, bar, coffee shop, grocery, pharmacy, drug store, child care, and gym land uses. Therefore, the highest available rate for comparable land uses is applied (i.e., 0.610 student per 1,000 square feet for “Neighborhood Shopping Centers”). The LAUSD 2016 Developer Fee Justification Study does not provide student generation factors for conference center, convention center, sport center, art space, event space, and museum land uses. Therefore, the highest available rate for comparable land uses is applied (i.e., 1.077 students per 1,000 square feet for “Standard Commercial Office”).</i>						
e	<i>Belmont Zone of Choice High Schools include: Miguel Contreras Learning Complex—Academic Leadership Community, Miguel Contreras Learning Complex—Business and Tourism, Miguel Contreras Learning Complex—School of Social Justice, Miguel Contreras Learning Complex—Los Angeles School of Global Studies, Ramon C. Cortines School of Visual &amp; Performing Arts, Belmont Senior High, Edward R. Roybal Learning Center, and Los Angeles Teacher Preparatory High School (closed 2016–2017 School Year).</i>						
f	<i>This project is an expansion of existing Metro bus maintenance and inspection facilities. Therefore, the student generation population is not expected to increase.</i>						
g	<i>This related project provides units per students and is not expected to generate students at the identified schools within the Project’s vicinity.</i>						
h	<i>This related project provides units per beds for hospital, inpatient facility, and assisted living uses. Therefore, this related project is not expected to generate students at the identified schools within the Project’s vicinity.</i>						
i	<i>This related project does not specify land uses. Therefore, the higher student generation rate for general mixed uses is applied (i.e., 1.077 students per 1,000 square feet for office uses).</i>						
j	<i>This related project provides units per seats for cinema or theater uses. The LAUSD 2016 Developer Fee Justification Study does not provide student generation rates per units of seats for theater uses. Therefore, this related project is not expected to generate students at the identified schools within the Project’s vicinity.</i>						
k	<i>This related project is proposing the development of a new school and is not expected to generate students at the identified schools within the Project’s vicinity.</i>						
l	<i>This related project does not specify the units of land use. Therefore, to provide a conservative analysis, the student generation rate per employee for non-residential land uses is applied (i.e., 0.2249 student per employee).</i>						
Source: Eyestone Environmental, 2018.							

provided in the LAUSD 2016 Developer Fee Justification Study.<sup>32</sup> It is important to note that these students would be generated over time, not all at once, as individual related projects become operational (for example, the Project is not anticipated to be operational until 2025). Additionally, these estimates are gross, not net, and do not reflect the removal of existing uses and associated students who may already be enrolled at LAUSD schools. Furthermore, this analysis is conservative as it does not account for the variety of other school options, such as charter schools, magnet schools, and private schools in the Project vicinity that could serve new residents generated by residential development associated with the related projects.<sup>33</sup> This analysis also does not account for future residents who may already reside in the school attendance boundaries and may move to residential units at the related projects. Last, it is noted that the student generation rates are averages throughout the LAUSD district and may not accurately reflect the characteristics of the related projects, generally all of which would be located in proximity to transit, which allows employees to travel greater distances without the need to move closer to jobs Downtown. Similarly, high-rise commercial office uses, which many of the related projects include, typically generate fewer students than the LAUSD averages. Accordingly, the student generation estimates are considered conservative.

As indicated above, the Project would generate approximately 569 new students, including 309 9th Street Elementary School students, 84 Sal Castro Middle School students, and 176 Belmont Zone of Choice high school students. Therefore, the Project in combination with the 160 related projects would have the potential to generate a cumulative total 20,638 students at the analyzed schools over time. Cumulatively, this would amount to 13,153 9th Street Elementary School students, 686 Sal Castro Middle School students, and 6,799 Belmont Zone of Choice high school students over time.

Based on existing (2015–2016) enrollment and capacity data from LAUSD, the schools serving the Project and related projects would not have adequate seating capacity. Specifically, with the addition of students generated by the Project in combination with the 160 related projects, 9th Street Elementary School, there would be a shortage of 13,010 seats (i.e., the existing excess capacity of 143 seats minus the 13,153 students generated the Project and related projects). Sal Castro Middle School would have a shortage of 499 seats (i.e., the existing excess capacity of 187 seats minus the

---

<sup>32</sup> *Many of the related projects are located in the attendance boundaries of one or two of the analyzed schools, but not all of the Project's assigned resident schools. These projects would generate students at other LAUSD schools which are not analyzed herein. Accordingly, impacts at the analyzed schools are overstated.*

<sup>33</sup> *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 are not inclusive of charter schools.*

686 students generated by the Project and related projects). For Belmont Zone of Choice high schools, there would be a shortage of 6,277 seats (i.e., the existing excess capacity of 522 seats minus the 6,799 students generated by the Project and related projects). However, it is again noted that these students would be generated over time, not all at once, as individual related projects become operational.

With regard to projected future (2020–2021) capacity data from LAUSD, 9th Street Elementary School would have a shortage of 13,084 seats (i.e., the future excess capacity of 69 seats minus the 13,153 students generated by the Project and related projects). Sal Castro Middle School would experience a shortage of 485 seats (i.e., future excess capacity of 201 seats minus the 686 students generated by the Project and related projects). At Belmont Zone of Choice high schools, there would be a shortage of 5,776 seats (i.e., the future excess capacity of 1,023 seats minus the 6,799 students generated by the Project and related projects). However, as previously noted, these students would be generated over time as individual related projects become operational, and in some cases, these projects may not generate students until after the 2020–2021 academic year (as in the case with the Project, which would not become operational until 2025).

Overall, when compared to both existing conditions and projected school capacities, the students generated by the Project in combination with the 160 related projects within the relevant school attendance boundaries would cause seating shortages at 9th Street Elementary School, Sal Castro Middle School, and Belmont Zone of Choice high schools.

This degree of cumulative growth would substantially increase the demand for LAUSD services in the Project Site vicinity. The Project would comprise approximately 2.76 percent of the total estimated cumulative growth in students. However, as with the Project, future development, including the related projects and other future development projects in the Community Plan area, would be required to pay development fees to LAUSD prior to the issuance of building permits pursuant to Senate Bill 50. Per Government Code Section 65995, the payment of these fees would be considered full and complete mitigation of school impacts generated by the Project and related projects.

Cumulative increases in student population due to related projects and other cumulative growth would be identified and addressed through the City's annual programming and budgeting processes. LAUSD resource needs would be identified and monies allocated according to the priorities at the time. Any requirement for a new school, or the expansion, consolidation, or relocation of an existing school would also be identified through this process, the impacts of which would be addressed accordingly. Furthermore, over time, LAUSD would continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment,

other special programs, and possibly school expansions or new school construction, which may become necessary to create sufficient student capacity. LAUSD has no known or proposed plans to expand schools or construct new facilities in the Community Plan area. Nonetheless, projects involving the construction or expansion of a school would be addressed independently pursuant to CEQA.

**Therefore, the Project's incremental contribution toward school impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.**

## **5. Mitigation Measures**

Project-level and cumulative impacts with regard to schools would be less than significant. Therefore, no mitigation measures are required.

## **6. Level of Significance After Mitigation**

Project-level and cumulative impacts related to schools would be less than significant without mitigation.