

# **IV. Environmental Impact Analysis**

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## **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 Site. Public schools in the City of Los Angeles are under the jurisdiction of the Los Angeles Unified School District (LAUSD). This section evaluates whether public school facilities serving the Project Site have sufficient capacity to accommodate the students projected to be generated by the Project. The analysis presented in this section is largely based on information provided by LAUSD (see Appendix J of this Draft EIR). Based on this information, facilities serving the Project Site were identified and a determination was made as to whether these facilities are adequate to meet the future demand associated with residents of the Project Site.

### **2. Environmental Setting**

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

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

While public education is generally regulated at the 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 Level**

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

The facilities and services of the LAUSD 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 (AB) 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 modified the fees structure and general guidelines.

*(b) SB 50 and Proposition 1A*

Senate Bill (SB) 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 for the November 3, 1998 election. Proposition 1A was approved by voters, thereby enabling SB 50 to become fully operative. Under SB 50, a program for funding school facilities largely based on matching funds was created. Its construction grants provide funding on a 50/50 state and local match basis, while its modernization grant provides funding on a 60/40 basis. Districts unable to provide some, or all, of the local match requirement may meet financial hardship provisions and are potentially eligible for additional state funding.<sup>1</sup>

In addition, SB 50 allows governing boards of school districts to establish fees to offset costs associated with school facilities made necessary by new construction. Pursuant to SB 50, the 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 the LAUSD new school construction facility fee is required prior to issuance of building permits. Pursuant to California 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 the LAUSD, is largely funded by local property tax. While property tax is assessed at a local level, it is the State which allocates the tax revenue to each district according to average daily attendance rates.

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<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 July 19, 2017.*

### (3) Regional Level

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. The LAUSD operates under the policy direction of an elected governing district school board (elected from the local area), as well as by local propositions which directly impact the funding of facility construction and maintenance. Pursuant to SB 50, the LAUSD collects developer fees for new construction within its district boundaries.

### (4) Local Level

As stated above, the State is primarily responsible for the funding and structure of the local school districts, and in this case, the LAUSD. As the LAUSD provides education to students in many cities and 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 Palms–Mar Vista–Del Rey Community Plan includes policies related to schools, such policies are directed toward the City and not to private development projects.

## **b. Existing Conditions**

### (1) Los Angeles Unified School District

The 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>3</sup> During the current 2016–2017 school year, LAUSD is providing 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>4</sup> The LAUSD is divided into six local districts, and the Project Site is located in the West Local District, as shown in Figure IV.I.3-1 on page IV.I.3-4.<sup>5</sup>

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<sup>3</sup> LAUSD, *Fingertip Facts 2016–2017*.

<sup>4</sup> *Ibid.*

<sup>5</sup> LAUSD, *Local District Map*, <http://achieve.lausd.net/domain/34>, accessed July 20, 2017.

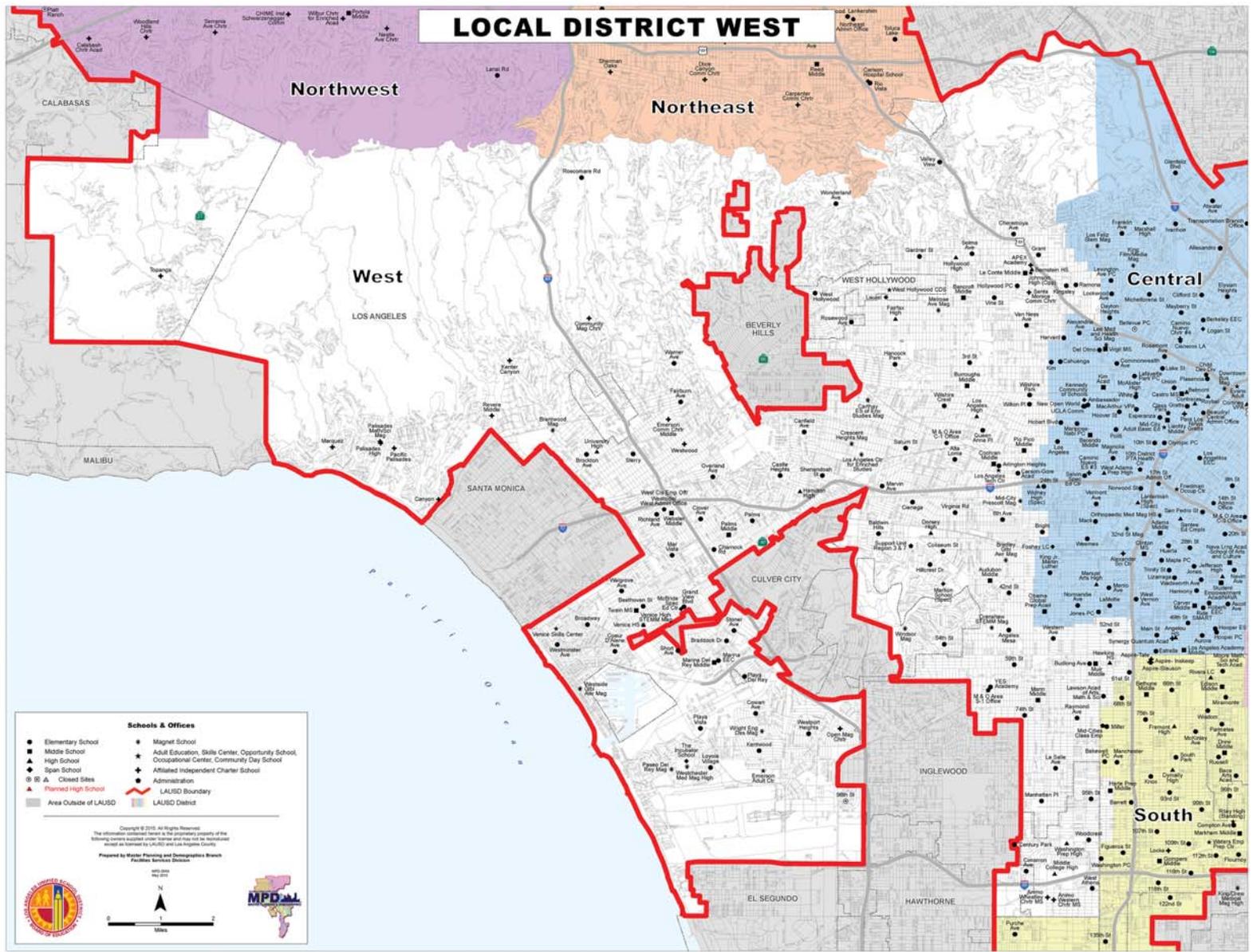


Figure IV.I.3-1

Los Angeles Unified School District Local District—West 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. The LAUSD's voter-approved Bond Program is currently valued at \$27.5 billion. Using these funding sources, LAUSD has implemented the New School Construction Program, a multi-year capital improvement program. The goals of the New School Construction Program are to: eliminate involuntary busing of students out of their home attendance areas, operate all schools on a traditional two-semester calendar, and implement full-day kindergarten throughout LAUSD. Through the New School Construction Program, LAUSD has delivered over 170,000 new classroom seats, completed over 20,000 repair and modernization projects, and achieved its primary goal of reducing overcrowding by transitioning schools to the traditional two-semester calendar. The next phase of improvements will focus on modernizing older schools by addressing critical repairs, safety issues, resource conservation, and technology upgrades through the School Upgrade Program.<sup>6</sup>

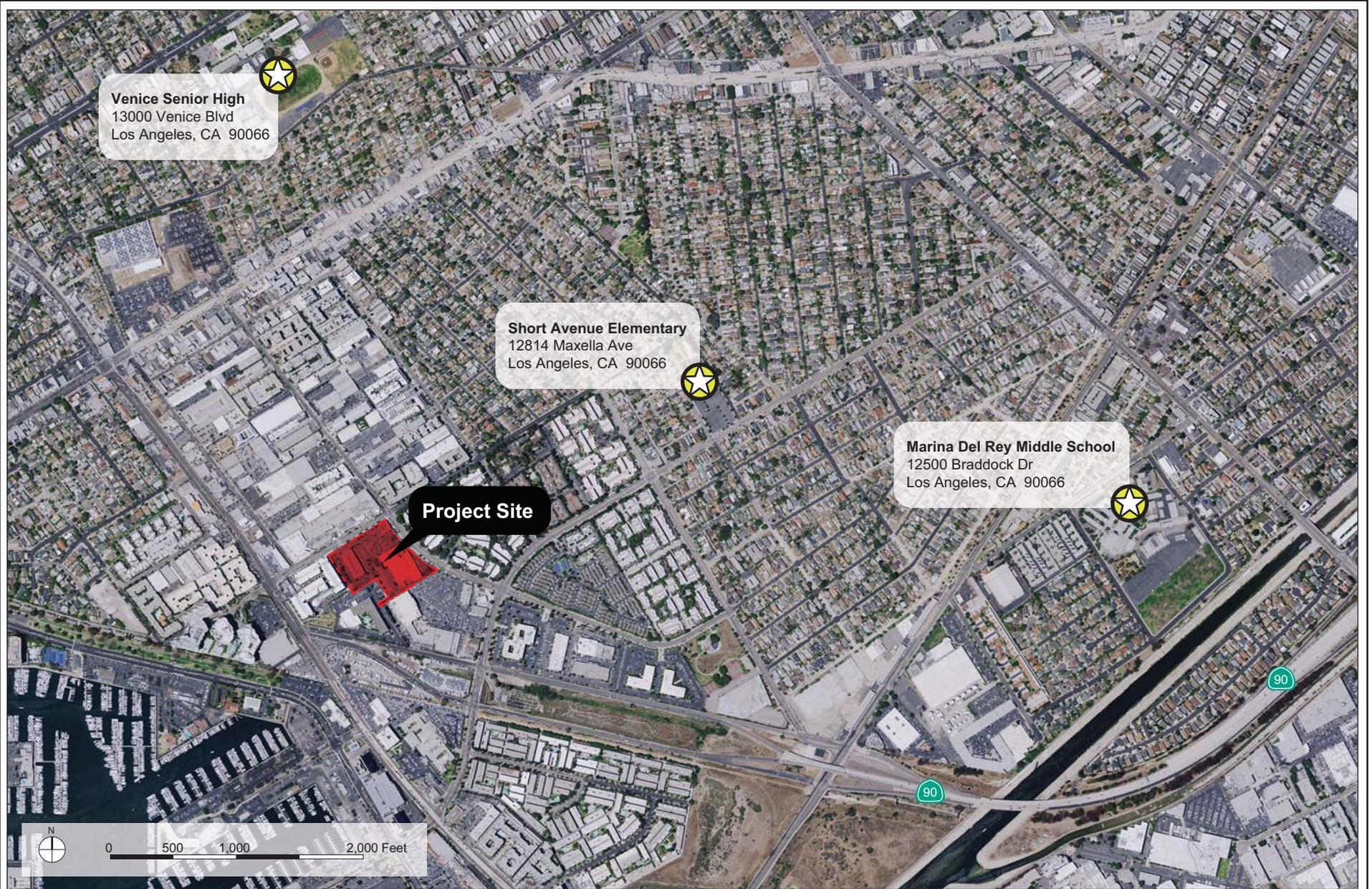
(a) *Public Schools*

As shown in Figure IV.I.3-2 on page IV.I.3-6, the public schools serving the Project Site are Short Avenue Elementary, Marina Del Rey Middle School, and Venice Senior High.<sup>7</sup> These schools currently operate under a single-track calendar in which instruction generally begins in early September and continues through late June. Table IV.I.3-1 on page IV.I.3-7 presents the academic year capacity, enrollment, and seating shortages/overages for each of these schools during the most recent school year (2016–2017) for which data is available. All data presented in the table already take into account 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>8</sup> According to the 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, and actual enrollment is defined as the number of students actually attending the school currently, including magnet students.

<sup>6</sup> LAUSD Facilities Services Division, *Facilities Services Division Strategic Execution Plan 2017*.

<sup>7</sup> LAUSD, *Resident School Identifier*, <http://rsi.lausd.net/ResidentSchoolIdentifier/>, accessed July 20, 2017.

<sup>8</sup> Letter from Rena Perez, Director, LAUSD, Facilities Services Division, dated July 14, 2017. See Appendix J of this Draft EIR.



**Venice Senior High**  
13000 Venice Blvd  
Los Angeles, CA 90066

**Short Avenue Elementary**  
12814 Maxella Ave  
Los Angeles, CA 90066

**Marina Del Rey Middle School**  
12500 Braddock Dr  
Los Angeles, CA 90066

**Project Site**



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

Source: Apple Maps, 2017.

**Table IV.I.3-1  
Existing (2016–2017) 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>
Short Avenue Elementary	317	396	262	(79)	<b>Yes</b>
Marina Del Rey Middle School	738	917	593	(179)	<b>Yes</b>
Venice Senior High	2,273	2,607	1,988	(334)	<b>Yes</b>

<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 used by charter co-locations. Includes capacity for magnet program.

<sup>b</sup> Total number of students living in the school's attendance area who are eligible to attend the school. Includes magnet students.

<sup>c</sup> Number of students actually attending the school currently, including magnet students.

<sup>d</sup> Seating overage or (shortage) based on capacity minus resident enrollment.

<sup>e</sup> The school is considered to be overcrowded or without available capacity if the school operates on a multi-track calendar, there is a seating shortage, or there is a seating overage of less than or equal to a "safety margin" of 20 seats.

Source: Letter from Rena Perez, Director, LAUSD, Facilities Services Division, dated July 14, 2017. See Appendix J of this Draft EIR.

The goal of the calculation is to determine the number of seats that are available for students residing within the attendance boundary. The LAUSD considers a school to be overcrowded if any one of the following occurs: (1) it currently operates on a multi-track calendar; (2) there is currently a capacity shortage; or (3) there is currently a capacity overage of less than or equal to a "safety margin" of 20 seats.

The LAUSD also projects the future capacity of its schools for the next five years.<sup>9</sup> Table IV.I.3-2 on page IV.I.3-8 shows the LAUSD's projected capacity at each of the schools serving the Project Site and vicinity, which are further discussed below.

*(i) Short Avenue Elementary*

Short Avenue Elementary is located at 12814 Maxella Avenue, approximately 0.6 mile northeast of the Project Site, and offers instruction for grades K–6 on a single-track

<sup>9</sup> As described in Section II, Project Description, of this Draft EIR, Project construction is anticipated to be completed in 2023. LAUSD projects future enrollment and capacity in five-year increments based on the most recent school year for which data is available, which is currently for the 2016–2017 school year. Therefore, projected future enrollment and capacity data considered in this analysis is for the 2021–2022 school year.

**Table IV.I.3-2  
Projected 2021–2022 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>
Short Avenue Elementary	285	408	(123)	<b>Yes</b>
Marina Del Rey Middle School	686	991	(305)	<b>Yes</b>
Venice Senior High	2,137	2,735	(598)	<b>Yes</b>

<sup>a</sup> Schools planning capacity. Formulated from a baseline calculation of the number of eligible classrooms. This includes the capacity currently used by charter co-locations and for magnet programs.

<sup>b</sup> 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.

<sup>c</sup> Per the LAUSD, projected seating overage/(shortage) is projected capacity minus projected resident enrollment.

<sup>d</sup> The school is projected to be overcrowded or without available capacity if any of these conditions exist: the school remains on a multi-track calendar, there will be a capacity shortage, or there will be a capacity overage of less than or equal to a "safety margin" of 20 seats.

Source: Letter from Rena Perez, Director, LAUSD, Facilities Services Division, dated July 14, 2017. See Appendix J of this Draft EIR.

calendar. During the 2016–2017 academic year, Short Avenue Elementary had a total capacity for 317 students, a residential enrollment of 396 students, and an actual enrollment of 262 students. Therefore, since the school's capacity of 317 students is less than the residential enrollment of 396 students, Short Avenue Elementary is considered overcrowded under existing conditions.

LAUSD's five-year projection for Short Avenue Elementary indicates that the school is projected to have a capacity for 285 students and a projected resident enrollment of 408 students, resulting in a projected seating shortage of 123 seats. Therefore, Short Avenue Elementary is projected to experience overcrowding in the future.

*(ii) Marina Del Rey Middle School*

Marina Del Rey Middle School is located at 12500 Braddock Drive, approximately 1.4 miles east of the Project Site, and offers instruction for grades 6–8 on a single-track calendar. During the 2016–2017 academic year, Marina Del Rey Middle School had a total capacity for 738 students, a residential enrollment of 917 students, and an actual enrollment of 593 students. Therefore, since the school's available capacity of 738 students is less than the residential enrollment of 917 students, Marina Del Rey Middle School is considered overcrowded under existing conditions.

LAUSD's five-year projection for Marina Del Rey Middle School indicates that the school is projected to have a capacity for 686 students and a projected residential enrollment of 991 students, resulting in a projected seating shortage of 305 seats. Therefore, Marina Del Rey Middle School is projected to experience overcrowding in the future.

*(iii) Venice Senior High*

Venice Senior High is located at 13000 Venice Boulevard, approximately 1.2 miles north of the Project Site, and offers instruction for grades 9–12 on a single-track calendar. During the 2016–2017 academic year, Venice Senior High had a total capacity for 2,273 students, a resident enrollment of 2,607 students, and an actual enrollment of 1,988 students. Therefore, since the school's available capacity of 2,273 students is less than the residential enrollment of 2,607 students, Venice Senior High is considered overcrowded under existing conditions.

LAUSD's five-year projection for Venice Senior High indicates that the school is projected to have a capacity for 2,137 students and a projected residential enrollment of 2,735 students, resulting in a projected seating shortage of 598 seats. Therefore, Venice Senior High is projected to experience overcrowding in the future.

*(b) Open Enrollment Policy*

The open enrollment policy is a state-mandated policy that enables students anywhere in the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated open enrollment seats.<sup>10</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 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 residing in the State of California who wishes to attend. If the number of students who wish to attend a charter

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<sup>10</sup> LAUSD, *K–12 Open Enrollment* <http://achieve.lausd.net/K12OpenEnrollment>, accessed July 20, 2017.

school exceeds the school's capacity, the school determines admission based on a lottery.<sup>11</sup> LAUSD has over 274 independent and affiliated charter schools within its jurisdiction, serving over 138,000 students in grades kindergarten through 12th grade.<sup>12</sup> The charter schools in the vicinity of the Project Site include Animo Venice Charter High School, Ocean Charter School, Goethe International Charter School of LA, and ICEF Vista Middle Charter Academy.<sup>13</sup> Based on information provided by LAUSD, charter schools do not have residential attendance boundaries, and enrollment data for charter schools are not regularly reported to LAUSD. Thus, enrollment projections or capacity analyses provided by LAUSD are not inclusive of all charter schools; as indicated above, capacity and/or enrollment information may not be reported for some independent charter schools.<sup>14</sup>

*(d) Magnet Schools*

The option to attend “magnet” programs is also available to students living within the service boundaries of the LAUSD. Magnet programs provide specialized curriculums and instructional approaches to attract a voluntary integration of students from a variety of neighborhoods. Magnet programs typically establish a unique focus such as gifted and talented, math and science, performing arts, or basic skills programs. Some magnet programs occupy entire school sites, while other magnet centers are located on regular school campuses with access to activities and experiences shared with the host school. Currently, there are 260 magnet programs located within the LAUSD.<sup>15</sup> Magnet programs are offered at the following schools in the vicinity of the Project Site: Science, Technology, Engineering, Mathematics and Medicine Magnet at Venice Senior High School; World Languages and Global Studies Magnet at Venice Senior High School, Performing Arts Magnet at Marina Del Rey Middle School; and Westside Global Awareness Magnet.<sup>16</sup> Since enrollment is application-based for magnet schools, overcrowding is not determined for magnet schools.

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<sup>11</sup> LAUSD, Charter Schools Division, *About Charter Schools*: <http://achieve.lausd.net/Page/1816>, accessed July 20, 2017.

<sup>12</sup> *Ibid.*

<sup>13</sup> California Charter Schools Association (CCSA), [www.ccsa.org/schools/](http://www.ccsa.org/schools/), accessed July 20, 2017.

<sup>14</sup> Letter from Rena Perez, Director of Master Planning and Demographics, LAUSD Facilities Services Division, dated July 14, 2017. See Appendix J of this Draft EIR.

<sup>15</sup> LAUSD, Student Integrated Services, e-choices, Magnet Program, <http://echoices.lausd.net/Magnet/MagnetHome.aspx>, accessed October 11, 2017.

<sup>16</sup> LAUSD, Student Integration Services, e-choices, Magnet School Selection Tool, <http://echoices.lausd.net/Magnet/programinfo.aspx>, accessed July 20, 2017.

### (e) Pilot Schools

Pilot schools are a network of public schools that have autonomy over budget, staffing, governance, curriculum and assessment, and the school calendar.<sup>17</sup> Pilot schools were established in February 2007 when a Memorandum of Understanding was ratified by the LAUSD and the United Teachers Los Angeles, a union of professionals representing 31,000 public school teachers and health and human services professionals in Los Angeles, to create and implement 10 small, autonomous Belmont Pilot Schools within LAUSD Local District 4 with a specific focus on creating new, innovative schools to relieve overcrowding at Belmont High School.<sup>18</sup> Currently, there are 49 pilot schools located within the LAUSD.<sup>19</sup>

### (f) Proposed New Public Schools

LAUSD Facilities Services Division is managing a \$25.6 billion program to build new schools to reduce overcrowding and modernize existing campuses throughout LAUSD's service area. To date, more than 600 new projects providing more than 170,000 new seats have been constructed, and more than 22,000 school modernization projects have completed construction to provide upgraded facilities.<sup>20</sup> According to the LAUSD, there are no new proposed public schools planned to be built in the vicinity of the Project Site.<sup>21</sup>

## (2) Private Schools in the Project Vicinity

In addition to publicly available schools, there are also a number of private schools in the Project Site vicinity that could potentially serve as alternatives to LAUSD schools. Specifically there are two private schools, ranging from kindergarten through 8th grade, within 1 mile of the Project Site's street address.<sup>22</sup> Private school 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

<sup>17</sup> LAUSD, *Pilot Schools, FAQ*, [http://pilotschools.lausd.net/apps/pages/index.jsp?uREC\\_ID=190040&type=d](http://pilotschools.lausd.net/apps/pages/index.jsp?uREC_ID=190040&type=d), accessed July 25, 2017.

<sup>18</sup> LAUSD, *History*, [http://notebook.lausd.net/portal/page?\\_pageid=33,1252313&\\_dad=ptl&\\_schema=PTL\\_EP](http://notebook.lausd.net/portal/page?_pageid=33,1252313&_dad=ptl&_schema=PTL_EP), accessed July 20, 2017.

<sup>19</sup> LAUSD, *Pilot Schools, 2016–2017 List of Pilot Schools*.

<sup>20</sup> LAUSD Facilities Services Division, *Facilities Services Division Strategic Execution Plan 2017*.

<sup>21</sup> Letter from Rena Perez, Director of Master Planning and Demographics, LAUSD Facilities Services Division, dated July 14, 2017. See Appendix J of this Draft EIR.

<sup>22</sup> *Private School Review, Private Schools within 1 miles [sic] of 13400 Maxella Ave*, [www.privateschoolreview.com/schools-by-location/13400%20Maxella%20Ave%2C%20Marina%20Del%20Rey%2C%20CA%2090292-original-address-13400%20Maxella%20Ave/33.9868761/-118.4403573000002/1/None/0/0/None/None](http://www.privateschoolreview.com/schools-by-location/13400%20Maxella%20Ave%2C%20Marina%20Del%20Rey%2C%20CA%2090292-original-address-13400%20Maxella%20Ave/33.9868761/-118.4403573000002/1/None/0/0/None/None), accessed July 25, 2017.

relate to current and future enrollment capacity levels of schools in the LAUSD before or after implementation of the Project.

### 3. Project Impacts

#### a. Thresholds of Significance

In accordance with the State CEQA Guidelines 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?***

For this analysis, the Appendix G Threshold listed above is 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 L.A. CEQA Thresholds Guide identifies 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 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).

## b. Methodology

Operation-related impacts on schools were quantitatively analyzed to assess the ability of the 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 2016 LAUSD Developer Fee Justification Study.<sup>23</sup>

This analysis focuses on public schools that would serve the Project Site. This analysis does not take into account the 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 incoming schools would not suffer impacts due to the additional enrollment. Additionally, this analysis is also conservative as it does not account for the fact that there are several public school options such as charter schools and magnet schools, as well as private school options in the Project Site vicinity that could also serve Project residents, nor does it account for the Project's future residents who may already reside in the school attendance boundaries and would move to the Project Site.<sup>24</sup>

## c. Analysis of Project Impacts

### (1) Project Design Features

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

### (2) 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 school services?***

<sup>23</sup> Los Angeles Unified School District, 2012 Developer Fee Justification Study, February 9, 2012.

<sup>24</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.

*(a) Construction*

The Project would involve the development of 658 multi-family residential units and up to 27,300 square feet of neighborhood-serving commercial uses. The Project would generate part-time and full-time jobs associated with construction of the Project between the start of construction and Project buildout. However, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, which require construction workers to commute to job sites that change many times in the course of a year, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. Therefore, the construction employment generated by the Project would not result in a notable increase in the resident population or a corresponding demand for schools in the vicinity of the Project Site. **Impacts on school facilities during Project construction would be less than significant.**

*(b) Operation*

As noted above, the Project would include development of new residential units and neighborhood-serving commercial space. As shown in Table IV.1.3-3 on page IV.1.3-15, using the applicable LAUSD student generation rates for the Project's land uses, the Project would generate approximately 291 new students consisting of 158 elementary school students, 43 middle school students, and 90 high school students.

As discussed in Section II, Project Description, of this Draft EIR, the Project includes removal of three existing shopping center-related buildings that together comprise approximately 100,781 square feet of floor area. As shown in Table IV.1.3-3, using the applicable LAUSD student generation rates, the existing commercial buildings generate approximately 61 students, consisting of 33 elementary school students, nine middle school students, and 19 high school students.

When accounting for the removal of the existing on-site commercial uses, the Project would result in a net increase of 230 students consisting of 125 elementary school students, 34 middle school students, and 71 high school students.

It should be noted that the number of Project-generated students who could attend LAUSD schools serving the Project Site would likely be less than the above estimate because this analysis does not include LAUSD options that would allow students generated by the Project to enroll at other LAUSD schools located away from their home attendance area, or students who may enroll in private schools or participate in home-schooling. In addition, this analysis does not account for Project residents who may already reside in the school attendance boundaries and would move to the Project Site. Other LAUSD

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

Land Use	Number of Units	Students Generated <sup>a,b</sup>		
		Elementary (K–6)	Middle School (7–8)	High School (9–12)
Multi-Family Residential Units	658 du	149	40	85
Commercial (Retail/Restaurant)	27,300 sf	9	2	5
<b>Total Students Generated</b>		<b>158</b>	<b>43</b>	<b>90</b>
<i>Existing Commercial to be removed</i>	<i>100,781 sf</i>	<b>33</b>	<b>9</b>	<b>19</b>
<b>Net New Student Generation</b>		<b>125</b>	<b>34</b>	<b>71</b>

*du = dwelling units*

*sf = square feet*

*gsf = gross square feet*

<sup>a</sup> Based on student generation factors provided in the LAUSD Developer Fee Justification Study, March 2017. For the residential component, the following student generation rates were used: 0.2269 student per household (grades K–6), 0.0611 student per household (grades 7–8), and 0.1296 student per household (grades 9–12). For the Project's commercial component, the student generation rate of 0.610 student per 1,000 square feet for "Neighborhood Shopping Center" is applied. Since the LAUSD Developer Fee Justification Study does not specify which grade levels students fall within for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 54 percent elementary school, 15 percent middle school, and 31 percent high school).

<sup>b</sup> Numbers may not add up exactly due to rounding.

Source: Eyestone Environmental, 2017.

options, some of which are discussed above, that may be available to Project students include the following:

- Open enrollment that enables students anywhere within the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated open enrollment seats;
- Magnet schools and magnet centers (such as Science, Technology, Engineering, Mathematics and Medicine Magnet at Venice Senior High School, World Languages and Global Studies Magnet at Venice Senior High School, Performing Arts Magnet at Marina Del Rey Middle School, and Westside Global Awareness Magnet), which are open to qualified students in the LAUSD;
- 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>25</sup> The LAUSD provides transportation to all students enrolled in the Permits With Transportation Program regardless of where they live within the LAUSD;

- 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, Short Avenue Elementary, Marina Del Rey Middle School, and Venice Senior High would not have adequate capacity to accommodate the new students generated by the Project under existing conditions. Specifically, with the addition of Project-generated students, Short Avenue Elementary School would have a seating shortage of 204 students (i.e., existing seating shortage of 79 students in addition to the Project student generation of 125 students), Marina Del Rey Middle School would have a seating shortage of 213 students (i.e., existing seating shortage of 179 students in addition to the Project student generation of 34 students), and Venice Senior High would have a seating shortage of 405 students (i.e., existing seating shortage of 334 students in addition to the Project student generation of 71 students).

With regard to projected future capacity during the 2021–2022 academic year, Short Avenue Elementary School would have a seating shortage of 248 students (i.e., future seating shortage of 123 students in addition to the Project student generation of 125 students), Marina Del Rey Middle School would have a seating shortage of 339 students (i.e., future seating shortage 305 students in addition to the Project student generation of 34 students), and Venice Senior High would have a seating shortage of 669 students (i.e., future seating shortage of 598 students in addition to the Project student generation of 71 students).

Pursuant to SB 50, the Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of the Project's building permit. Pursuant to Government Code Section 65995, the payment of these fees is considered full and

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<sup>25</sup> *A feeder pattern is the linkage from elementary school, middle school, and high school.*

complete mitigation of Project-related school impacts. Therefore, payment of the applicable development school fees to the LAUSD would offset the potential impact of additional student enrollment at schools serving the Project Site. **Accordingly, with adherence to existing regulations, impacts on schools would be less than significant and mitigation measures would not be required.**

#### d. Cumulative Impacts

As identified in Section III, Environmental Setting, of this Draft EIR, there are 39 related projects located in the Project Site vicinity. Of the 39 related projects, 22 were identified as being located within the attendance boundaries of Short Avenue Elementary School, Marina Del Rey Middle School, or Venice Senior High. Therefore, these 22 related projects are considered in this cumulative analysis as these related projects would have the potential to combine with the Project and cumulatively generate new students who would attend Short Avenue Elementary School, Marina Del Rey Middle School, or Venice Senior High.

As shown in Table IV.1.3-4 on page IV.1.3-18, the 22 related projects located within the attendance boundaries of the same schools that would serve the Project could potentially generate 340 Short Avenue Elementary School students, 646 Marina Del Rey Middle School students, and 1,434 Venice Senior High students, based on the rates provided in the 2016 LAUSD Developer Fee Justification Study. As indicated above, the Project would generate approximately 230 new students consisting of 125 elementary school students, 34 middle school students, and 71 high school students. Therefore, the Project in combination with the 22 related projects would have the potential to generate a cumulative total of 465 Short Avenue Elementary School students, 680 Marina Del Rey Middle School students, and 1,506 Venice Senior High students.

Based on existing enrollment and capacity data from LAUSD, the schools serving the Project and the 22 related projects would not have adequate capacity. Specifically, with the addition of students generated by the Project in combination with the 22 related projects, Short Avenue Elementary School would have a seating shortage of 544 students (i.e., existing seating shortage of 79 students in addition to the Project plus related projects student generation of 465 students), Marina Del Rey Middle School would have a seating shortage of 859 students (i.e., existing seating shortage of 179 students in addition to the Project plus related projects student generation of 680 students), and Venice Senior High would have a seating shortage of 1,840 students (i.e., existing seating shortage for 334 students in addition to the Project plus related projects student generation of 1,506 students).

**Table IV.1.3-4  
Estimated Student Generation from Related Projects within the Attendance Boundaries of the Schools that Serve the Project Site**

No.	Project	Description	Size	Students Generated <sup>a,b,c</sup>		
				Short Ave. Elementary	Marina del Rey Middle School	Venice High School
1	High-Turnover Restaurant 1020 E. Venice Blvd.	High-Turnover Restaurant	3,895 gsf	—	—	1
2	New Apartment & Office Building 4140 S. Glencoe Ave.	Apartments	67 du	15	4	9
		Office	3,211 gsf	2	1	1
3	D1 by CLG 4210 S. Del Rey Ave.	Condominiums	136 du	31	8	18
		Office	14,929 gsf	9	2	5
4	4040 Del Rey Avenue Apartment Project 4040 S. Del Rey Ave.	Apartments	230 du	52	14	30
		Office	18,800 gsf	11	3	6
5	Marina Island 5000 Beethoven St.	Apartments	236 du	—	—	31
		Office	18,077 gsf	11	3	6
6	Teledyne Office Project 12964 W. Panama St.	Office	159,000 gsf	93	25	53
7	New 3-Story Manufacturing & Retail 595 Venice Blvd.	Office	25,150 gsf	—	—	8
		Retail	5,028 gsf	—	—	1
		Other	5,930 gsf	—	—	0
9	12575 Beatrice Street Office Project 12575 Beatrice St.	Office	173,028 gsf	—	27	58
		Restaurant	2,500 gsf	—	0	0
		Retail	900 gsf	—	0	0
10	Playa Vista Plant Site (Spruce Goose) Campus Center Dr./Bluff Creek Dr.	Production/Staging	1,129,900 gsf	—	178	378
		Office	572,050 gsf	—	90	191
11	Village at Playa Vista Phase II South of Jefferson Blvd./Westlawn Ave.	Condominiums	2,600 du	—	159	337
		Office	175,000 gsf	—	28	58
		Retail	150,000 gsf	—	13	28
		Community Serving	40,000 gsf	—	2	4

**Table IV.I.3-4 (Continued)**  
**Estimated Student Generation from Related Projects within the Attendance Boundaries of the Schools that Serve the Project Site**

No.	Project	Description	Size	Students Generated <sup>a,b,c</sup>		
				Short Ave. Elementary	Marina del Rey Middle School	Venice High School
12	Venice Place 1027 S. Abbot Kinney Blvd.	Hotel	92 rm	—	—	5
		Retail	3,000 gsf	—	—	1
		Restaurant	2,072 gsf	—	—	0
13	Inclave Mixed-Use Project 4065–71 Glencoe Ave.	Creative Office	35,206 gsf	21	6	12
		Specialty Retail	1,500 gsf	0	0	0
		Apartments	49 du	11	3	6
14	DIR-2016-54-DB 12575 W. Venice Blvd.	Apartments	52 du	—	—	7
15	DIR-2016-304-DB-SPR 12444 W. Venice Blvd.	Apartments	77 du	—	—	10
		Retail	2,100 gsf	—	—	0
17	Warehouse to Office 4721 S. Alla Road	Office	118,352 gsf	69	19	40
18	Stella Phase 2 13488 W. Maxella Ave.	Apartments	65 du	15	4	8
20	DIR-2016-3999-DB 11830 W. Courtleigh Dr.	Apartments	29 du	—	2	4
<b>LA County</b>						
1	Courtyard by Marriott and Residence Inn Southeast Corner of Via Marina and Tahiti Way	Hotel	288 rms	—	7	15
		Park	1.46 ac	—	N/A	N/A
2	Neptune Marina Via Marina and Marquesas Way	Apartments	390 du	—	24	51
3	AMLI MDR 4242 Via Marina	Apartments	297 du	—	18	38
		Commercial	3,600 gsf	—	0	1

**Table IV.I.3-4 (Continued)**  
**Estimated Student Generation from Related Projects within the Attendance Boundaries of the Schools that Serve the Project Site**

No.	Project	Description	Size	Students Generated <sup>a,b,c</sup>		
				Short Ave. Elementary	Marina del Rey Middle School	Venice High School
4	Pier 44 4625 & 4635 Admiralty Way	Specialty Grocery	13,625 gsf	—	1	3
		Retail	41,680 gsf	—	4	8
		Restaurant	9,978 gsf	—	1	2
		Office	2,645 gsf	—	0	1
		Marina	141 berths	—	N/A	N/A
		Boatwright Facility	5,300 gsf	N/A	N/A	N/A
<b>Total Related</b>				<b>340</b>	<b>646</b>	<b>1,434</b>
<b>Project</b>				<b>125</b>	<b>34</b>	<b>71</b>
<b>Total Related + Project</b>				<b>465</b>	<b>680</b>	<b>1,506</b>

ac = acres

du = dwelling units

gsf = gross square feet

sf = square feet

rm = rooms

stu = students

N/A = No generation rate available

— = Related project is not located within the attendance boundary of that school. Therefore, student generation was not calculated.

<sup>a</sup> For residential uses, the following student generation rates were used: 0.4 student per household (grades K–6), 0.1 student per household (grades 7–8), and 0.2 student per household (grades 9–12). Since the 2016 LAUSD Developer Fee Justification Study does not specify which grade levels students fall within for non-residential land uses, the students generated by 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 57 percent elementary school, 14 percent middle school, and 29 percent high school).

<sup>b</sup> The 2016 LAUSD Developer Fee Justification Study does not provide a student generation factor for restaurant, special events, theater, studio, sound stage, stage support, museum, amphitheater, theme park, nightclub, coffee shop, bar/lounge, or gym types of land uses. Therefore, the highest available rate for comparable land uses is applied (i.e., 0.729 student per 1,000 square feet for Neighborhood Shopping Centers).

**Table IV.1.3-4 (Continued)**  
**Estimated Student Generation from Related Projects within the Attendance Boundaries of the Schools that Serve the Project Site**

No.	Project	Description	Size	Students Generated <sup>a,b,c</sup>		
				Short Ave. Elementary	Marina del Rey Middle School	Venice High School
<sup>c</sup> <i>The 2016 LAUSD Developer Fee Justification Study does not provide a student generation factor for hotels per room, theaters per seat, or tutoring centers per students or employees.</i> <i>Source: Eyestone Environmental, 2017.</i>						

With regard to projected future capacity, Short Avenue Elementary School would have a seating shortage of 588 students (i.e., future seating shortage of 123 students in addition to the Project plus related projects student generation of 465 students), Marina Del Rey Middle School would have a seating shortage of 985 students (i.e., future seating shortage of 305 students in addition to the Project plus related projects student generation of 680 students), and Venice Senior High would have a seating shortage of 2,104 students (i.e., future seating shortage of 598 students in addition to the Project plus related projects student generation of 1,506 students) with the addition of students generated by the Project in combination with the 22 related projects. As such, the students generated by the Project in combination with the 22 related projects located within the school attendance boundaries would cause a shortage when compared to existing conditions and projected school capacity at Short Avenue Elementary School, Marina Del Rey Middle School, and Venice Senior High.

This degree of cumulative growth would increase the demand for LAUSD services in the Project Site vicinity. However, the Project would comprise a small percentage (i.e., approximately 8.7 percent) of the total estimated cumulative growth in students. Furthermore, as with the Project, future development, including the related projects, would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits pursuant to SB 50. **Pursuant to Government Code Section 65995, the payment of these fees would be considered full and complete mitigation of school impacts generated by the related projects. Therefore, the Project's incremental contribution toward school impacts would not be cumulatively considerable.**

### **e. Mitigation Measures**

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

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

Project-level and cumulative impacts related to schools would be less than significant.