

IV. Environmental Impact Analysis

H.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. 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 or if new or physically altered government facilities (i.e., schools) would be required. The analysis is based in part on information provided by Los Angeles Unified School District (LAUSD) included in Appendix K to this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) Federal

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

(a) California Education Code

The facilities and services of 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 grant provides 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.¹

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, LAUSD collects development fees for new construction within its district boundaries. Payment of the LAUSD new school construction facility fee is required prior to issuance of building permits. Pursuant to California Government Code Section 65995(h), 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 which allocates the tax revenue to each district according to average daily attendance rates.

(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 which directly impact the funding of

¹ State of California, Office of Public School Construction, *School Facility Program Handbook*, January 2019.

facility construction and maintenance. Pursuant to SB 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 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 Hollywood Community Plan includes policies related to schools, such policies are directed towards 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.² During the current 2020–2021 school year, LAUSD is providing kindergarten through high school (Grades K–12) education to approximately 550,779 students enrolled throughout 1,413 schools and centers. These include 18 primary school centers, 439 elementary schools, 77 middle schools, 88 high schools, 54 option schools, 65 magnet schools, 28 multi-level schools, 12 special education schools, two home/hospital centers, 245 magnet centers on regular campuses (Grades K–12), 231 charter schools, and 154 other schools and centers.³ The LAUSD is divided into six local districts, and the Project Site is located in the West Local District.⁴

As discussed above, SB 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. Using these funding sources, LAUSD has implemented the New School Construction Program, a multi-year capital improvement

² LAUSD, *Fingertip Facts 2020–2021*.

³ LAUSD, *Fingertip Facts 2020–2021*.

⁴ LAUSD, *Local District Map*, <https://achieve.lausd.net/domain/34>, accessed February 19, 2021.

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 seats, completed over 22,000 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.⁵

(a) Public Schools

As shown in Figure IV.H.3-1 on page IV.H.3-5, the Project Site is within the attendance boundaries of Kingsley Elementary School, Le Conte Middle School, and high schools in the Bernstein Zone of Choice including Bernstein Senior High and Bernstein Senior High Science Technology Engineering and Math.^{6,7} These schools currently operate under a single-track calendar in which instruction generally begins in early September and continues through late June. Table IV.H.3-1 on page IV.H.3-6 presents the academic year capacity, enrollment, and seating shortages/overages for each of these schools during the 2019–2020 school year provided by LAUSD. 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.⁸ 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 boundary 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. 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

⁵ LAUSD Facilities Services Division, *Facilities Services Division Strategic Execution Plan 2019*.

⁶ Letter from Vincent Maffei, Interim Director, School Management Services and Demographics, dated November 19, 2020. See Appendix K of this Draft EIR.

⁷ Bernstein Zone of Choice is comprised of two independently-operated high schools located within one facility. Students in grades 9-12 may apply to attend Helen Bernstein High School or the Science, Technology, Engineering, and Math (STEM) Academy.

⁸ Letter from Vincent Maffei, Interim Director, School Management Services and Demographics, dated November 19, 2020. See Appendix K of this Draft EIR.

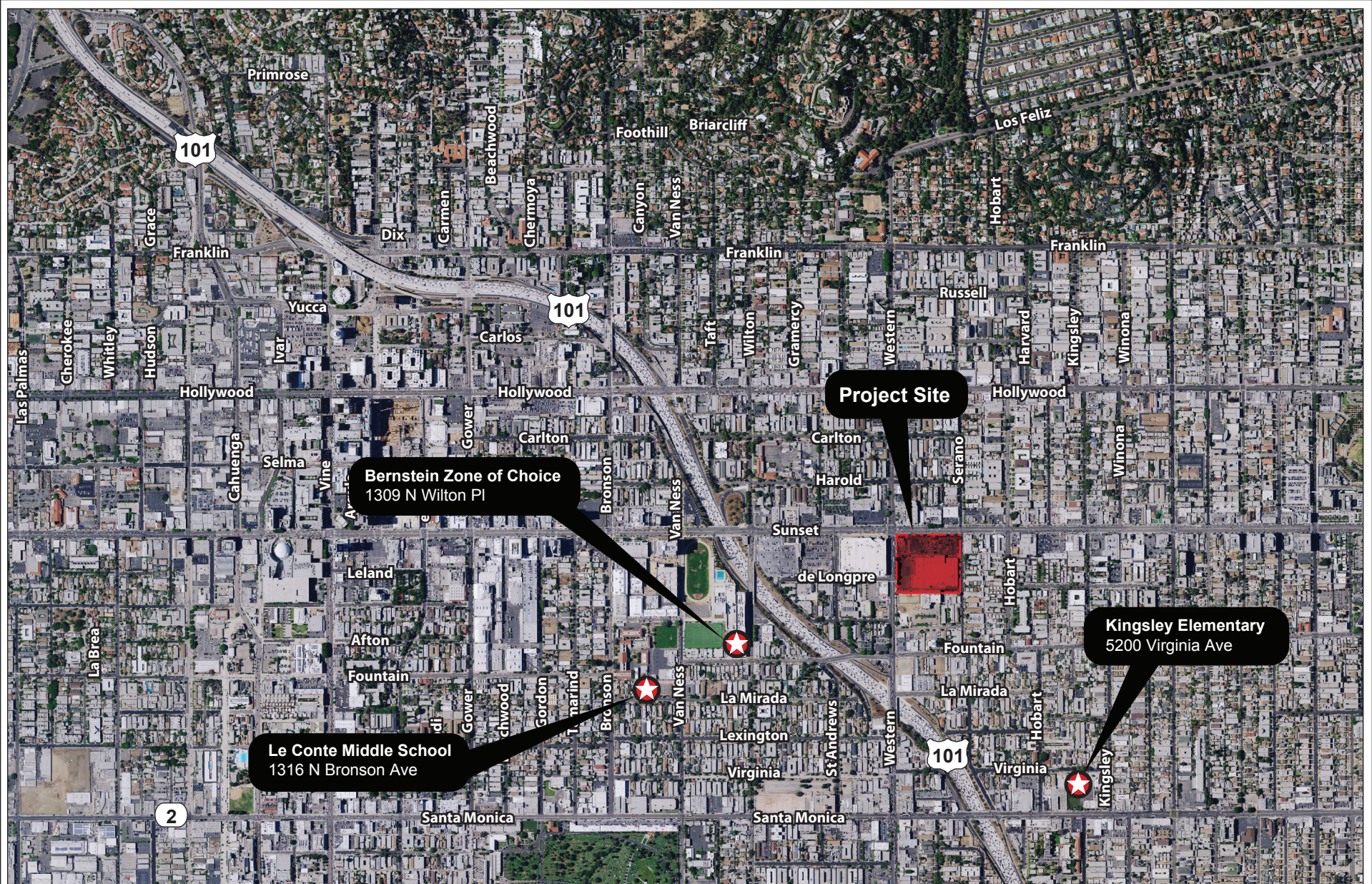


Figure IV.H.3-1
Schools Serving the Project Vicinity

**Table IV.H.3-1
2019–2020 Enrollment and Capacity of LAUSD Schools that Serve the Project Site**

School Name	Current Capacity^a	Resident Enrollment^b	Actual Enrollment^c	Current Seating Overage/ (Shortage)^d	Overcrowded Now^e
Kingsley Elementary	425	408	365	17	Yes
Le Conte Middle School	634	1,188	744	(554)	Yes
Bernstein Zone of Choice ^f	1,536	1,284	1,268	252	No
<p>^a 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.</p> <p>^b Total number of students living in the school's attendance area who are eligible to attend the school. Includes magnet students.</p> <p>^c Number of students actually attending the school currently, including magnet students.</p> <p>^d Seating overage or (shortage) based on capacity minus resident enrollment.</p> <p>^e 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.</p> <p>^f Bernstein Zone of Choice is comprised of two independently operated high schools located within one facility. Students in grades 9–12 may apply to attend Helen Bernstein High School or the Science, Technology, Engineering, and Math (STEM) Academy. The capacity and enrollment data in this table is a combination of both schools.</p> <p>Source: Letter from Vincent Maffei, Interim Director, School Management Services and Demographics, dated November 19, 2020. See Appendix K of this Draft EIR.</p>					

currently a capacity shortage; or (3) there is currently a capacity overage of less than or equal to a "safety margin" of 20 seats.

LAUSD also projects the future capacity of its schools for the next five years.⁹ Table IV.H.3-2 on page IV.H.3-7 shows LAUSD's projected capacity at each of the schools serving the Project Site vicinity, which are further discussed below. No new school construction is planned and the data provided by LAUSD already take into account portable classrooms on-site, additions being built onto existing schools, student permits and transfers, programs serving choice areas, and any other operational activities or educational programming affecting the operating capacities and enrollments among LAUSD schools.

⁹ As described in Section II, Project Description, of this Draft EIR, Project construction is anticipated to be completed in 2026. However, LAUSD projects future enrollment and capacity in five-year increments based on the most recent school year for which data is available, which is for the 2019–2020 school year. Therefore, projected future enrollment and capacity data considered in this analysis is for the 2024–2025 school year.

Table IV.H.3-2
Projected 2024–2025 Enrollment and Capacity of LAUSD Schools that Serve the Project Site

School Name	Projected Capacity^a	Projected Enrollment^b	Projected Seating Overage/ (Shortage)^c	Overcrowding Projected in Future^d
Kingsley Elementary	425	298	127	No
Le Conte Middle School	634	1,082	(448)	Yes
Bernstein Zone of Choice ^e	1,536	1,260	276	No
<p>^a Schools planning capacity. Formulated from a baseline calculation of the number of eligible classrooms after implementing LAUSD operational goals. This includes the capacity currently used by charter co-locations and for magnet programs. As indicated in its November 19, 2020, letter included as Appendix K of this Draft EIR, LAUSD assumed future capacity is the same as current capacity.</p> <p>^b 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.</p> <p>^c Per LAUSD, projected seating overage/(shortage) is projected capacity minus projected resident enrollment.</p> <p>^d 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.</p> <p>^e Bernstein Zone of Choice is comprised of two independently operated high schools located within one facility. Students in grades 9–12 may apply to attend Helen Bernstein High School or the Science, Technology, Engineering, and Math (STEM) Academy. The capacity and enrollment data in this table is a combination of both schools.</p> <p>Source: Letter from Vincent Maffei, Interim Director, School Management Services and Demographics, dated November 19, 2020. See Appendix K of this Draft EIR.</p>				

(i) Kingsley Elementary

Kingsley Elementary is located at 5200 Virginia Avenue, approximately 0.7 mile southeast of the Project Site, and offers instruction for grades K–5 on a single-track calendar. During the 2019–2020 academic year, Kingsley Elementary had a total capacity for 425 students, a residential enrollment of 408 students, and an actual enrollment of 365 students. Therefore, because the difference between the school's capacity (425) and residential enrollment (408) is within the safety margin of 20 seats, Kingsley Elementary is considered overcrowded under existing conditions.

LAUSD's five-year projection for Kingsley Elementary indicates that the school is projected to have a capacity for 425 students and an enrollment of 298 students, resulting in a seating overage of 127 seats. Therefore, Kingsley Elementary is not projected to experience overcrowding in the future.

(ii) Le Conte Middle School

Le Conte Middle School is located at 1316 North Bronson Avenue, approximately 0.8 mile southwest of the Project Site, and offers instruction for grades 6–8 on a single-track calendar. During the 2019–2020 academic year, Le Conte Middle School had a total capacity for 634 students, a residential enrollment of 1,188 students, and an actual enrollment of 744 students. Therefore, since the school's available capacity of 634 students is less than the residential enrollment of 1,188 students, Le Conte Middle School is considered overcrowded under existing conditions.

LAUSD's five-year projection for Le Conte Middle School indicates that the school is projected to have a capacity for 634 students and a projected enrollment of 1,082 students, resulting in a seating shortage of 448 seats. Therefore, Le Conte Middle School is projected to experience overcrowding in the future.

(iii) Bernstein Zone of Choice Schools

The Project Site is located within the Bernstein Zone of Choice, where students in grades 9–12 may apply to attend either Helen Bernstein High School or the STEM Academy. Both schools are independently operated within the same facility at 1309 North Wilton Place, approximately 0.5 mile southwest of the Project Site, and offer instruction for grades 9–12 on a single-track calendar. APEX Academy, a charter school, also shares the same facility. However, as discussed further below, charter schools do not have residential boundaries and enrollment data is not regularly reported to LAUSD.

During the 2019–2020 academic year, the Bernstein Zone of Choice schools had a total capacity for 1,536 students, a resident enrollment of 1,284 students, and an actual enrollment of 1,268 students. Based on the capacity of the Bernstein Zone of Choice schools for 1,536 students and its resident enrollment of 1,284 students, the school had a seating overage of 252 seats. Therefore, Bernstein Zone of Choice schools are not considered overcrowded under existing conditions (residential enrollment).

LAUSD's five-year projection for the Bernstein Zone of Choice schools indicates that they will have a total capacity for 1,536 students and a projected enrollment of 1,260 students, resulting in a seating overage of 276 seats. Therefore, the Bernstein Zone of Choice schools are not 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 LAUSD to apply to any regular, grade-appropriate LAUSD school with designated open enrollment seats.¹⁰ 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 residing in the State of California who wishes to attend. If the number of students who wish to attend a charter school exceeds the school's capacity, the school determines admission based on a lottery.¹¹ LAUSD has 280 independent and affiliated charter schools within its jurisdiction, serving over 138,000 students in grades kindergarten through 12th grade.¹² The charter schools in the vicinity of the Project Site include the Citizens of the World Charter Hollywood, APEX Academy, and Santa Monica Boulevard Community Charter School.¹³ 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, enrollment projections or capacity analyses provided by LAUSD are not inclusive of charter schools.¹⁴

(d) Magnet Schools

The option to attend "magnet" programs is also available to students living within the service boundaries of LAUSD. Magnet programs provide specialized curriculums and

¹⁰ LAUSD, *K-12 Open Enrollment* <https://achieve.lausd.net/K12OpenEnrollment>, accessed February 19, 2021.

¹¹ LAUSD, *Charter Schools Division, About Charter Schools*: <http://achieve.lausd.net/Page/1816>, accessed February 19, 2021.

¹² LAUSD, *Charter Schools Division, About Charter Schools*: <http://achieve.lausd.net/Page/1816>, accessed February 19, 2021.

¹³ *California Charter Schools Association (CCSA), Find a School*, www.ccsa.org/find-a-school, accessed February 19, 2021.

¹⁴ *Email communication with LAUSD, Gwenn Godek, LAUSD OEHS, Contract Professional/CEQA Advisor*. January 25, 2017.

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 310 magnet programs located within LAUSD.¹⁵ Magnet programs offered at the following schools within one mile of the Project Site include Le Conte Middle School Center for Enriched Studies (CES) Communication and Arts Magnet, Le Conte Middle School Health/Engineering/Applied Sciences/Technology Magnet, Bernstein High School Cinematic Arts and Creative Technologies Magnet, and the Los Feliz Science/Tech/Engineer/Math/Medicine Magnet.¹⁶ 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 budget, staffing, governance, curriculum and assessment, and the school calendar.¹⁷ 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.¹⁸ Currently, there are 44 pilot schools located within the LAUSD.¹⁹

¹⁵ LAUSD, *Student Integrated Services, e-choices, Magnet Program*, <http://echoices.lausd.net/magnet>, accessed February 19, 2021.

¹⁶ LAUSD, *Your School Search Results*, [https://explorelausd.schoolmint.net/school-finder/results/?address.direction=W%20&address.name=Sunset&address.number=5420&address.point.lat=34.09808251731936&address.point.lng=-118.30824002544779&address.postal=90027&address.query=5420%20W%20Sunset%20Blvd%2C%20Los%20Angeles%2C%20CA%2C%2090027%2C%20USA&address.suffix=%20Blvd&address.suffixDirection=&address.type=location&id&parent_id&programs\[\]=magnet_theme.magnet_business&programs\[\]=magnet_theme.magnet_center_enriched_studies&programs\[\]=magnet_theme.magnet_comm_arts&programs\[\]=magnet_theme.magnet_gifted&programs\[\]=magnet_theme.magnet_highly_gifted&programs\[\]=magnet_theme.magnet_liberal_arts&programs\[\]=magnet_theme.magnet_pub_service&programs\[\]=magnet_theme.magnet_stem&programs\[\]=magnet_theme.magnet_vis_arts&sort=match_score&sortToHide](https://explorelausd.schoolmint.net/school-finder/results/?address.direction=W%20&address.name=Sunset&address.number=5420&address.point.lat=34.09808251731936&address.point.lng=-118.30824002544779&address.postal=90027&address.query=5420%20W%20Sunset%20Blvd%2C%20Los%20Angeles%2C%20CA%2C%2090027%2C%20USA&address.suffix=%20Blvd&address.suffixDirection=&address.type=location&id&parent_id&programs[]=magnet_theme.magnet_business&programs[]=magnet_theme.magnet_center_enriched_studies&programs[]=magnet_theme.magnet_comm_arts&programs[]=magnet_theme.magnet_gifted&programs[]=magnet_theme.magnet_highly_gifted&programs[]=magnet_theme.magnet_liberal_arts&programs[]=magnet_theme.magnet_pub_service&programs[]=magnet_theme.magnet_stem&programs[]=magnet_theme.magnet_vis_arts&sort=match_score&sortToHide) accessed February 19, 2021.

¹⁷ LAUSD, *Pilot Schools, FAQ*, <https://achieve.lausd.net/Page/2830>, accessed February 10, 2021.

¹⁸ LAUSD, *History of Pilot Schools*, <https://achieve.lausd.net/Page/2841>, accessed February 10, 2021.

¹⁹ LAUSD, *History of Pilot Schools*, <https://achieve.lausd.net/Page/2841>, accessed February 10, 2021.

(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.²⁰ 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.²¹ According to LAUSD, there are no new proposed public schools planned to be built in the Project vicinity.²²

(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 approximately 10 private schools within one mile of the Project Site.²³ 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 relate to current and future enrollment capacity levels of schools in LAUSD before or after implementation of the Project.

3. Project Impacts

a. Thresholds of Significance

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

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

²⁰ LAUSD, Facilities Services Division, <http://laschools.org/new-site/>, accessed February 19, 2021.

²¹ LAUSD, Facilities Services Division, <http://laschools.org/new-site/>, accessed February 19, 2021.

²² Letter from Vincent Maffei, Interim Director, School Management Services and Demographics, LAUSD Facilities Services Division, dated November 19, 2020. See Appendix K of this Draft EIR.

²³ Private School Review, Private Schools within 1 miles [sic] of 5420 Sunset Boulevard, www.privateschoolreview.com/schools-by-location/5420%20sunset%20blvd%2C%20los%20angeles%2C%20ca%2090027-original-address-5420%20sunset%20boulevard%2C%20los%20angeles%2C%20ca/34.0969439/-118.3076554/1/none/0/0/none/none/0, accessed February 19, 2021.

In assessing impacts related to schools in this section, the City will use Appendix G as the thresholds of significance. The factors identified from the *L.A. CEQA Thresholds Guide* will be used where applicable and relevant to assist in analyzing the Appendix G thresholds. Specifically, the *L.A. CEQA Thresholds Guide* states that the determination of the significance of impacts related to schools shall be made on a case-by-case basis, considering the following factors:

- 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 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 2020 LAUSD Developer Fee Justification Study.²⁴

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 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

²⁴ Los Angeles Unified School District, 2020 Developer Fee Justification Study, March 2020.

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.²⁵ This analysis also does not account for ongoing facilities planning by LAUSD or other measures to reduce overcrowding such as boundary changes.

c. Project Design Features

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

d. Analysis of Project Impacts

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

(1) Impact Analysis

(a) Construction

The Project would involve the development of 735 multi-family residential units and up to 95,000 square feet of neighborhood-serving commercial uses, including market/retail 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, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project because construction workers move from construction site to construction site throughout the region as specific jobs are temporary/short-term in nature. 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. **Therefore, it is not anticipated that new or physically altered government**

²⁵ *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.*

facilities, the construction of which would cause significant environmental impacts, would be required and impacts would be less than significant.

(b) Operation

The Project would directly generate students through the construction of 735 new multi-family residential uses. As noted above, the Project would also include development of neighborhood-serving commercial uses, including market/retail and restaurant uses. While unlikely given the nature of this employment, the Project's commercial component could generate students as employees of the commercial uses may relocate to the Project Site vicinity. However, some of these jobs would be filled by existing residents who already generate a demand for school facilities in the area. As shown in Table IV.H.3-3 on page IV.H.3-15, using the applicable LAUSD student generation rates for the Project's land uses, the Project would generate approximately 368 new students consisting of 200 elementary school students, 54 middle school students, and 114 high school students.

As discussed in Section II, Project Description, of this Draft EIR, the Project includes removal of 100,796 square feet of commercial uses on the Project Site, 82,271 square feet of which are occupied. As shown in Table IV.H.3-3, using the applicable LAUSD student generation rates, the existing occupied commercial uses are expected to result in approximately 52 students, consisting of 29 elementary school students, 8 middle school students, and 16 high school students.

When accounting for the removal of the existing on-site commercial uses, the Project would result in a net increase of 315 students consisting of 171 elementary school students, 46 middle school students, and 98 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 options, some of which are discussed above, that may be available to Project 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;

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

Land Use	Number of Units	Students Generated ^a		
		Elementary (K–6)	Middle School (7–8)	High School (9–12)
Multi-Family Residential Units	735 du	167	45	95
Retail/Restaurant	95,000 sf	33	9	19
Total Students Generated		200	54	114
<i>Existing occupied commercial to be removed.^b</i>	<i>100,796 sf</i>	29	8	16
Net New Student Generation		171	46	98
<p>du = dwelling units sf = square feet gsf = gross square feet Numbers may not sum due to rounding.</p> <p>^a Based on student generation factors provided in the 2020 LAUSD Developer Fee Justification Study, March 2020. For residential uses, 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 Commercial uses, the student generation rate of 0.000638 student per sf for Neighborhood Shopping Centers. 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).</p> <p>^b The existing 18,525 square feet of vacant commercial space would also be removed as part of the Project. However, this space is unoccupied and assumed to generate zero students.</p> <p>Source: Eyestone Environmental, 2021.</p>				

- Magnet schools and magnet centers (such as Le Conte Middle School CES Communication and Arts Magnet, Le Conte Middle School Health/Engineering/ Applied Sciences/Technology Magnet, Bernstein High School Cinematic Arts and Creative Technologies Magnet, and the Los Feliz Science/Tech/Engineer/Math/ Medicine Magnet), which are open to qualified students in 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.²⁶ LAUSD provides transportation to all students enrolled in the Permits With Transportation Program regardless of where they live within LAUSD;

²⁶ A feeder pattern is the linkage from elementary school, middle school, and high school.

- 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 2019–2020 enrollment and capacity data from LAUSD, one of the schools serving the Project would have adequate capacity with the addition of Project-generated students. Specifically, Kingsley Elementary would have a seating shortage of 154 students (i.e., existing capacity for 17 students less the Project student generation of 171 students) and Le Conte Middle School would have a seating shortage of 600 students (i.e., existing shortage of 554 students in addition to the Project student generation of 46 students). The schools in the Bernstein Zone of Choice would have a seating overage of 154 students (i.e., existing overage of 252 students less the Project student generation of 98 students).

With regard to projected future capacity, Kingsley Elementary would have a seating shortage of 44 students (i.e., future capacity for 127 students minus the Project student generation of 171 students), Le Conte Middle School would have a seating shortage of 494 students (i.e., future shortage of 448 students in addition to the Project student generation of 46 students), and the schools in the Bernstein Zone of Choice would have a seating overage of 178 students (i.e., future overage of 276 students minus the Project student generation of 98 students).

Pursuant to SB 50, the Applicant would be required to pay development fees for schools 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. Using these funding sources, LAUSD would be able to continue to implement the New School Construction Program, a multi-year capital improvement program, which aims to reduce overcrowding throughout LAUSD. **Therefore, payment of the applicable development school fees to LAUSD would allow LAUSD to provide adequate school facilities to serve the community, including new or expanded facilities as may be necessary. Accordingly, with adherence to existing regulations, impacts on schools would be less than significant, and mitigation measures would not be required.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts related to schools were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant.

e. Cumulative Impacts

(1) Impact Analysis

As identified in Section III, Environmental Setting, of this Draft EIR, there are 100 related projects located in the Project Site vicinity. Of these, 34 related projects were identified as being located within the attendance boundaries of Kingsley Elementary, Le Conte Middle School, and the Bernstein Zone of Choice schools. Therefore, these 34 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 Kingsley Elementary, Le Conte Middle School, and the Bernstein Zone of Choice schools.

As shown in Table IV.H.3-4 on page IV.H.3-18, the 34 related projects located within the attendance boundaries of the same schools that would serve the Project could potentially generate 109 Kingsley Elementary School students, 983 Le Conte Middle School students, and 446 students within the Bernstein Zone of Choice schools, based on the rates provided in the 2020 LAUSD Developer Fee Justification Study. As indicated above, the Project would generate approximately 317 net new students consisting of 171 elementary school students, 46 middle school students, and 98 high school students. Therefore, the Project in combination with the 34 related projects would have the potential to generate a cumulative total of 280 Kingsley Elementary School students, 1,029 Le Conte Middle School students, and 544 students within the Bernstein Zone of Choice schools.

Based on existing enrollment and capacity data from LAUSD, the schools serving the Project and the 34 related projects would not have adequate capacity. Specifically, with the addition of students generated by the Project in combination with the 34 applicable related projects, Kingsley Elementary School would have a seating shortage of 263 students (i.e., existing capacity for 17 students less the Project plus related projects student generation of 280 students), Le Conte Middle School would have a seating

Table IV.H.3-4
Estimated Student Generation from Related Projects within the Attendance Boundaries of the Schools that Serve the Project Site

No.	Project Name/Address	Description	Unit/Area	Students Generated ^{a,b}		
				Kingsley Elementary	Le Conte Middle School	Bernstein Zone
1.	Paseo Plaza Mixed-Use 5651 W. Santa Monica Blvd.	Condominiums	375 du	—	23	49
		Retail	377,900 sf	—	36	75
2.	BLVD 6200 Mixed-Use 6200 W. Hollywood Blvd.	Live/Work (JLWQ)	28 du	—	2	—
		Apartments	1,014 du	—	62	—
		Retail	175,000 sf	—	17	—
3.	Sunset Bronson Studios 5800 W. Sunset Blvd.	Office	404,799 sf	—	67	142
7.	Mixed-Use 5245 W. Santa Monica Blvd.	Apartments	49 du	12	3	7
		Retail	32,272 sf	12	4	7
9.	Hollywood Production Center 1149 N. Gower St.	Apartments	57 du	—	4	—
10.	Hollywood Gower Mixed-Use 6100 W. Hollywood Blvd.	Apartments	220 du	—	14	—
		Restaurant	3,270 sf	—	1	—
11.	Pantages Theater Office 6225 W. Hollywood Blvd.	Office	210,000 sf	—	35	—
13.	Argyle Hotel Project 1800 N. Argyle Ave.	Hotel	225 rm	—	6	—
15.	Hotel & Restaurant Project 6381 W. Hollywood Blvd.	Hotel	80 rm	—	2	—
		Restaurant	15,290 sf	—	2	—
21.	Target Retail Shopping Center Project 5520 W. Sunset Blvd.	Discount Store	163,862 sf	—	16	33
		Shopping Center	30,887 sf	—	3	7

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

No.	Project Name/Address	Description	Unit/Area	Students Generated ^{a,b}		
				Kingsley Elementary	Le Conte Middle School	Bernstein Zone
24.	Millennium Hollywood Mixed-Use Project 1740 N. Vine St.	Apartments	492 du	—	31	—
		Hotel	200 rm	—	5	—
		Office	100,000 sf	—	17	—
		Fitness Club	35,000 sf	—	4	—
		Retail	15,000 sf	—	2	—
		Restaurant	34,000 sf	—	4	—
25.	Paramount Pictures 5555 W. Melrose Ave.	Production Office	635,500 sf	—	105	—
		Office	638,100 sf	—	106	—
		Retail	89,200 sf	—	9	—
		Stage	21,000 sf	—	2	—
		Support Uses	1,900 sf	—	1	—
30.	Columbia Square Mixed-Use 6121 W. Sunset Blvd.	Apartments	200 du	—	13	—
		Office	422,610 sf	—	70	—
		Retail/Restaurant	41,300 sf	—	4	—
		Hotel	125 rm	—	3	—
31.	Mixed-Use (High Line West) 5550 W. Hollywood Blvd.	Apartments	280 du	—	18	—
		Retail	12,030 sf	—	2	—
34.	Sunset & Vine Mixed-Use 1538 N. Vine St.	Apartments	306 du	—	19	—
		Retail	68,000 sf	—	7	—
36.	6250 Sunset (Nickelodeon) 6250 W. Sunset Blvd.	Apartments	200 du	—	13	—
		Retail	4,700 sf	—	1	—
40.	1717 Bronson Avenue 1717 N. Bronson Ave.	Apartments	89 du	—	6	—

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

No.	Project Name/Address	Description	Unit/Area	Students Generated ^{a,b}		
				Kingsley Elementary	Le Conte Middle School	Bernstein Zone
42.	Mixed-Use 1350 N. Western Ave.	Apartments	200 du	46	13	26
		Guest Rooms	4 rm	1	1	1
		Retail/Restaurant	5,500 sf	2	1	2
43.	Palladium Residences 6201 W. Sunset Blvd.	Apartments	731 du	—	45	—
		Retail/Restaurant	24,000 sf	—	3	—
44.	5600 W Hollywood Boulevard 5600 W. Hollywood Blvd.	Apartments	33 du	—	3	—
		Commercial	1,289 sf	—	1	—
45.	5750 Hollywood 5750 Hollywood Blvd.	Apartments	161 du	—	10	—
		Commercial	4,747 sf	—	1	—
61.	Apartments 5460 W. Fountain Ave.	Apartments	75 du	18	5	10
62.	Mixed-Use 6220 W. Yucca St.	Hotel	210 rm	—	5	—
		Apartments	136 du	—	9	—
		Restaurant	6,980 sf	—	1	—
63.	SunWest Project (Mixed-Use) 5525 W. Sunset Blvd.	Apartments	293 du	—	18	38
		Commercial	33,980 sf	—	4	7
64.	Hollywood De Longpre Apartments 5632 De Longpre Ave.	Apartments	185 du	—	12	24
67.	Mixed-Use 1657 N. Western Ave.	Apartments	91 du	—	6	—
		Retail	15,300 sf	—	2	—
70.	citizenM Hotel 1718 Vine St.	Hotel	216 rm	—	5	—
		Restaurant	4,354 sf	—	1	—
72.	Mixed-Use 1868 N. Western Ave.	Apartments	96 du	—	6	—
		Retail	5,546 sf	—	1	—

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

No.	Project Name/Address	Description	Unit/Area	Students Generated ^{a,b}		
				Kingsley Elementary	Le Conte Middle School	Bernstein Zone
76.	6200 West Sunset Boulevard 6200 W. Sunset Blvd.	Apartments	270 du	—	17	—
		Quality Restaurant	1,750 sf	—	1	—
		Pharmacy	2,300 sf	—	1	—
		Retail	8,070 sf	—	1	—
77.	747 North Western Avenue 747 N. Western Ave.	Apartments	44 du	—	3	6
		Retail	7,700 sf	—	1	2
84.	Onni Group Mixed-Use Development 1360 N. Vine St.	Condominium	429 du	—	27	—
		Grocery	55,000 sf	—	6	—
		Retail	5,000 sf	—	1	—
		Restaurant	8,988 sf	—	1	—
88.	Modera Argyle 1546 N. Argyle Ave.	Apartments	276 du	—	17	—
		Retail	9,000 sf	—	1	—
		Restaurant	15,000 sf	—	2	—
91.	6140 Hollywood 6140 Hollywood Blvd.	Hotel	102 rm	—	3	—
		Condominium	27 du	—	2	—
		Restaurant	11,460 sf	—	2	—
99.	1276 North Western Avenue 1276 N. Western Ave.	Apartments	75 du	18	5	10
Total Related				108	1,021	541
Project				171	46	98
Total Related + Project				279	1,067	639
<hr/> <i>du = dwelling units</i> <i>rm = rooms</i>						

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

No.	Project Name/Address	Description	Unit/Area	Students Generated ^{a,b}		
				Kingsley Elementary	Le Conte Middle School	Bernstein Zone
<i>sf = square feet</i> <i>— = The related project is not located within the attendance boundary of that school; therefore, student generation was not calculated.</i> <i>^a For residential uses, 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). Since the 2020 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 54 percent elementary school, 15 percent middle school, and 31 percent high school).</i> <i>^b The 2020 LAUSD Developer Fee Justification Study does not provide a student generation factor for restaurant, theater, studio, sound stage, stage support, 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., 0.638 student per 1,000 square feet for Neighborhood Shopping Centers).</i>						
Source: Eyestone Environmental, 2021.						

shortage of 1,583 students (i.e., existing seating shortage of 554 students in addition to the Project plus related projects student generation of 1,029 students), and the Bernstein Zone of Choice schools would have a seating shortage of 292 students (i.e., existing seating overage of 252 students in addition to the Project plus related projects student generation of 544 students).

With regard to projected future capacity, Kingsley Elementary School would have a seating shortage of 153 students (i.e., future capacity for 127 students less the Project plus related projects student generation of 280 students), Le Conte Middle School would have a seating shortage of 1,477 students (i.e., future seating shortage of 448 students in addition to the Project plus related projects student generation of 1,029 students), and the Bernstein Zone of Choice schools would have a seating shortage of 268 students (i.e., future seating overage of 252 students in addition to the Project plus related projects student generation of 544 students) with the addition of students generated by the Project in combination with the 34 related projects. As such, the students generated by the Project in combination with the 34 related projects located within the school attendance boundaries would cause a shortage when compared to existing conditions and projected school capacity at Kingsley Elementary School, Le Conte Middle School, and the Bernstein Zone of Choice schools.

This degree of cumulative growth would increase the demand for LAUSD services in the Project Site vicinity, and new school facilities may be needed. As with the Project, future development, including the related projects, would be required to pay development fees for schools to LAUSD prior to the issuance of building permits pursuant to SB 50, which would allow LAUSD to continue to implement its New School Construction Program or other future capital improvement programs, and develop new school facilities or expand existing ones as needed to meet demand. Pursuant to Government Code Section 65995(h), the payment of these fees would be considered full and complete mitigation of school impacts generated by the related projects. In addition, the Project would comprise a very small percentage (i.e., approximately 19.7 percent) of the total estimated cumulative growth in students.²⁷ Furthermore, LAUSD continues to evaluate its ongoing facilities needs with long term planning efforts and periodic adjustment of attendance boundaries to regulate the number of students in a school's service area. **Therefore, cumulative impacts would be less than significant and the Project's incremental contribution towards school impacts would not be cumulatively considerable.**

²⁷ *303 students generated from Project net ÷ 1,538 students generated from Related Projects = 19.7 percent.*

(2) Mitigation Measures

Cumulative impacts with regard to schools would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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