

IV. Environmental Impact Analysis

K.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 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 of information provided by Los Angeles Unified School District (LAUSD) included in Appendix N of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) Federal Level

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

(2) State 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 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 costs for construction, modernization, or reconstruction of school facilities. Subsequent legislation has modified the fee structure and general guidelines.

(b) Senate Bill 50 and Proposition 1A

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

In addition, Senate Bill 50 allows governing boards of school districts to establish fees to offset costs associated with school facilities made necessary by new construction. Pursuant to Senate Bill 50, 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 \$3.79 per square foot of new residential construction, \$0.61 per square foot of commercial construction, \$0.28 per square foot of self-storage structure, and \$0.39 per square foot of parking structure.² Payment of the LAUSD new school construction facility fee is required prior to issuance of building permits. Pursuant to 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 the LAUSD, is largely funded by local property tax. While property tax is assessed at a local level, it is the state that allocates tax revenue to each district according to average daily attendance rates.

(3) Regional

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 that directly impact funding of facility

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

² Los Angeles Department of Building and Safety, *Permit Fee Estimate*, <http://netinfo.ladbs.org/feecalculator/3950786566dd7fcc88258152007def26?OpenForm>, accessed February 2, 2021.

construction and maintenance. Pursuant to Senate Bill 50, the 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 Central City Community Plan (Community Plan) includes policies related to schools, such policies are related to location, site layout, and architectural design of schools. Therefore, the Community Plan policies relating to schools does not apply to this Project.

The LAUSD Strategic Plan 2016–2019 (Strategic Plan) represents LAUSD's framework towards a commitment to 100 percent graduation.³ In following the Strategic Plan's fundamental strategy, LAUSD directs its efforts and resources to recruit, develop, and support principals and teachers in creating a learning environment that ensures 100 percent of students achieve and graduate. The Strategic Plan identified five main objectives: Build a Solid Foundation for Early Learners; Proficiency for All; 100 Percent Attendance; Parent, Community, and Student Engagement; and School Safety. These objectives were supplemented with commitments, such as the following:

- Ensuring that 75 percent of LAUSD's early education programs receive a score of 4 or better as measured by the Quality Rating Improvement System by the 2018–2019 school year.
- Having quality arts instruction accessible to every child in 100 percent of schools by the 2018–2019 (e.g., music, theater, dance, visual arts, and film/media) school year.
- Increasing the number of bilingual bi-literate high school graduates by 60 percent by the 2018–2019 school year.
- Reducing the number of students who are chronically absent by 30 percent by the 2018–2019 school year.

³ LAUSD, *Strategic Plan 2016–2019*.

- Ensuring that 100 percent of LAUSD parents will be registered and ready to use the Parent Access Support System Portal (PASSport) by the end of the 2018–2019 school year.
- 100 percent of schools will be trained and fully implementing restorative justice practices by the end of the 2019–2020 school year.

Furthermore, the Strategic Plan provides key initiatives to achieve these commitments from which implementation plans will be created. Plans will be structured to include specific action steps, responsibilities, and timelines. As such, LAUSD will be able to monitor and measure progress and provide accountability during the Strategic Plan's implementation process. As of February 2021, a new Strategic Plan has yet to be adopted for 2020 and 2021.⁴

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.⁵ During the 2018–2019 school year, LAUSD provided kindergarten through high school (Grades K–12) education to approximately 601,973 students enrolled in 1,322 schools and centers. These include 19 primary school centers, 449 elementary schools, 79 middle schools, 94 senior high schools, 54 option schools, 51 magnet schools, 24 multi-level schools, 13 special education schools, two home/hospital centers, 203 magnet centers on regular campuses (Grades K–12), 216 charter schools, and 118 other schools and centers.⁶ The LAUSD is divided into six local districts.⁷ The Project Site is located in the Central Local District, as shown in Figure IV.K.3-1 on page IV.K.3-5.

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

⁴ LAUSD, *2016-2019 Strategic Plan*, <https://achieve.lausd.net/Page/477>, accessed February 5, 2021.

⁵ LAUSD, *Fingertip Facts 2018–2019*.

⁶ LAUSD, *Fingertip Facts 2018–2019*.

⁷ LAUSD, *Local District Map*, <http://achieve.lausd.net/domain/34>, accessed November 18, 2020.

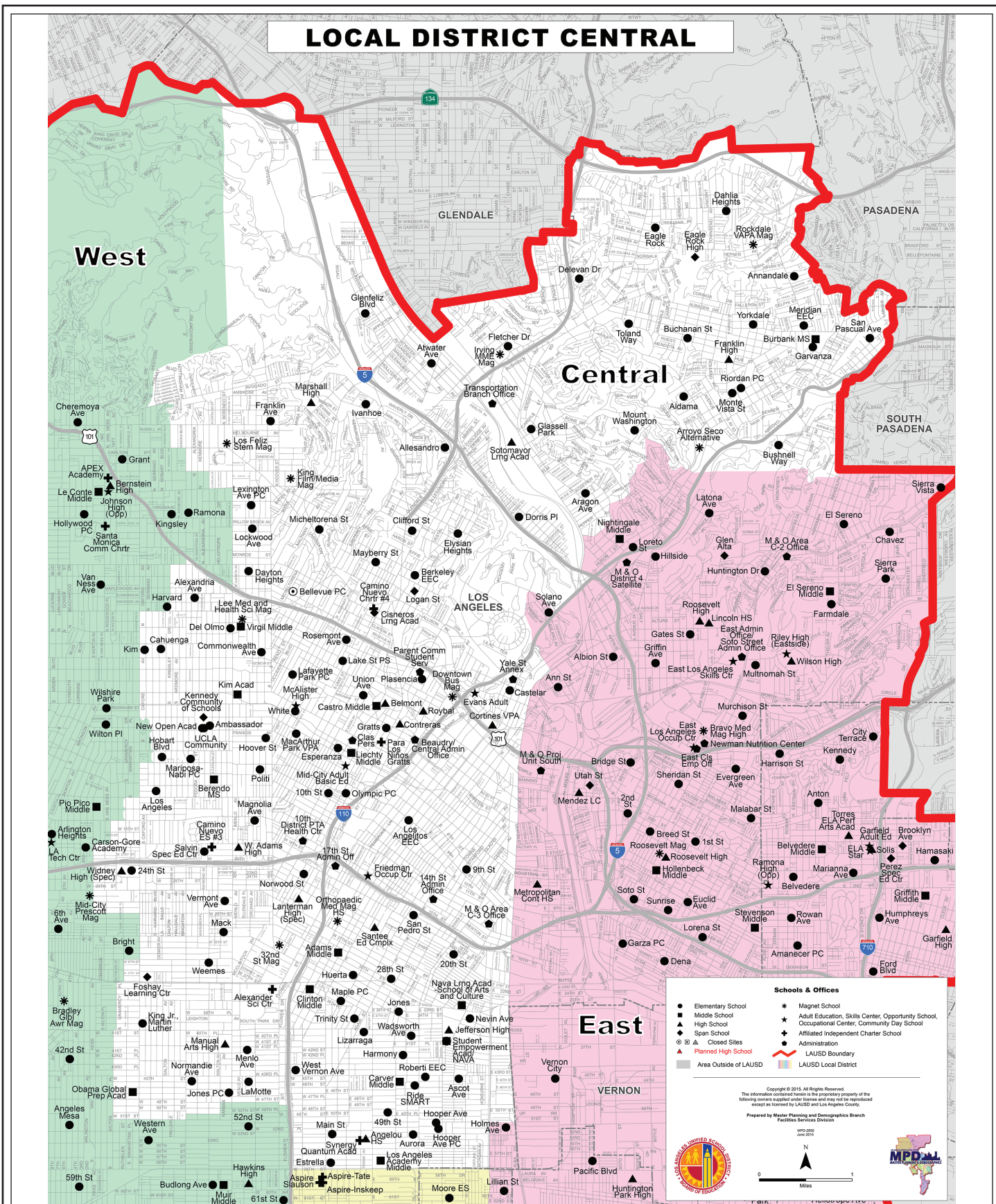


Figure IV.K.3-1
 Los Angeles Unified School District
 Central Local District Boundary Map

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.⁸

(a) Public Schools

As shown in Figure IV.K.3-2 on page IV.K.3-7, the public schools that serve students in the vicinity of the Project Site include Castelar Street Elementary, Nightingale Middle School, and high schools in the Belmont Zone of Choice.⁹ These schools currently operate under a single-track calendar in which instruction generally begins in mid-August and continues through early June. Table IV.K.3-1 on page IV.K.3-8 presents the academic year capacity, enrollment, and seating shortages/overages for each of these schools during the most recent school year (2017–2018) for which data are available. All data presented in the table already account for the use of portable classrooms on-site, additions being built onto existing schools, student permits and transfers, specific educational programs running at the schools, and any other operational activities or educational programming that affect the capacities and enrollments of the schools.¹⁰

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. Actual enrollment is defined as the number of students actually attending the school currently, including magnet students.

⁸ LAUSD Facilities Services Division, *Facilities Services Division Strategic Execution Plan 2017*.

⁹ Belmont Zone of Choice high schools include: Contreras Learning Center—Academic Leadership Community, Ramon C. Cortines School of Visual & Performing Arts, Miguel Contreras Learning Complex—Business and Tourism, Miguel Contreras Learning Complex—School of Social Justice, Belmont Senior High, Edward R. Roybal Learning Center, and Miguel Contreras Learning Complex—Los Angeles School of Global Studies.

¹⁰ Letter from Rena Perez, Director of Master Planning and Demographics, LAUSD Facilities Services Division, dated October 10, 2018. See Appendix N of this Draft EIR.

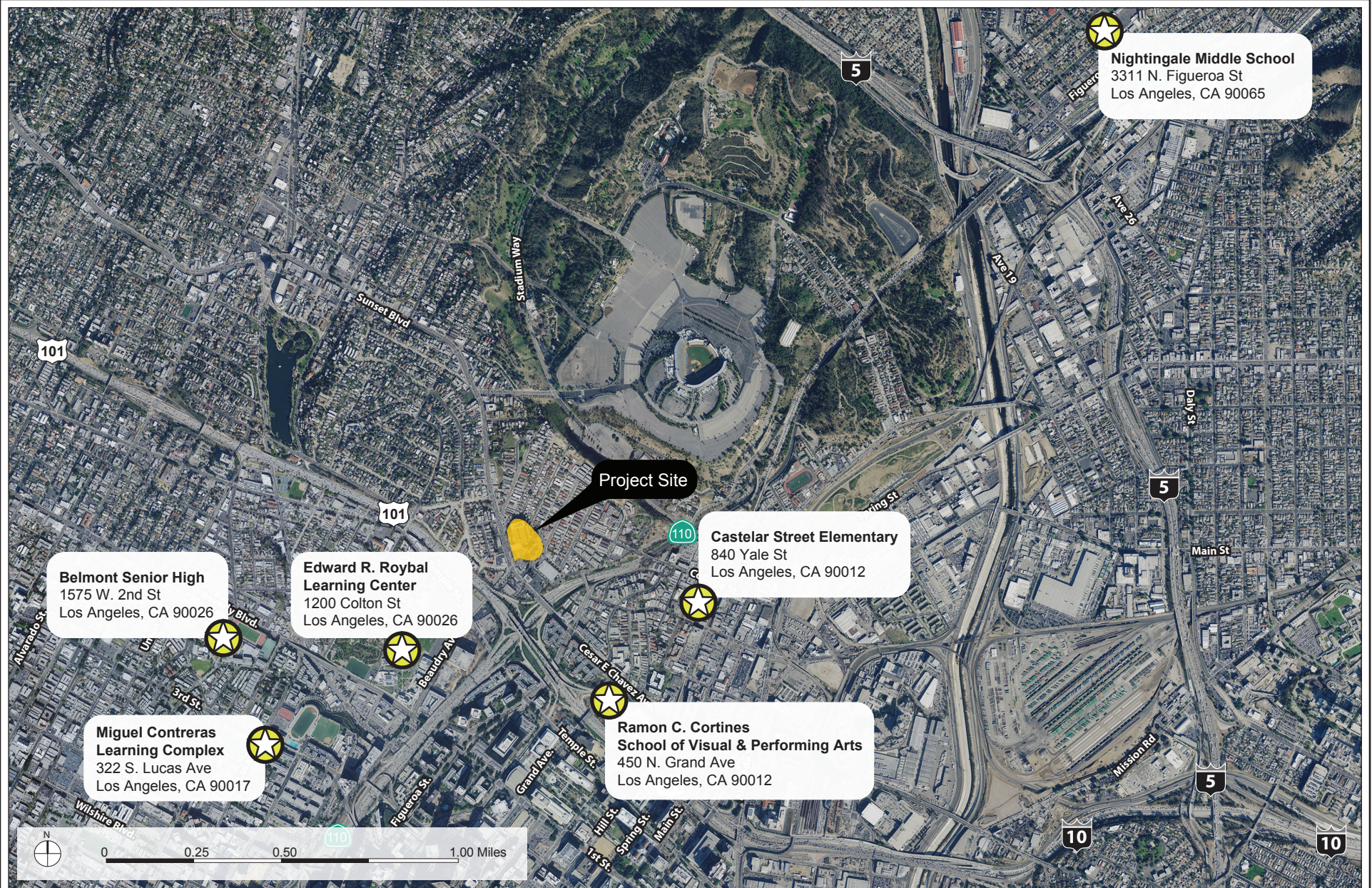


Figure IV.K.3-2
Schools Serving the Project Vicinity

**Table IV.K.3-1
Existing (2017–2018) Enrollment and Capacity of LAUSD Schools that Serve the Project Site^a**

School Name	Current Capacity^b	Resident Enrollment^c	Actual Enrollment^d	Current Seating Overage/ (Shortage)^e	Overcrowded Now?^f
Castelar Street Elementary	724	625	671	99	No
Nightingale Middle School	850	1,530	805	(680)	Yes
Belmont Zone of Choice High Schools ^g	6,594	6,925	4,967	(331)	Yes

^a LAUSD enrollment information for the schools serving the Project Site during the 2017-2018 school year is current as to the time of the issuance of the Notice of Preparation (NOP) for the Project on May 21, 2018.

^b School's operating capacity, or the maximum number of students the school can serve while operating on its current calendar. Excludes capacity allocated to charter co-locations. Includes capacity for magnet programs.

^c Total number of students living in the school's attendance area, who are eligible to attend the school. Includes magnet students.

^d Number of students actually attending the school currently, including magnet students.

^e Seating overage or (shortage) based on capacity minus resident enrollment.

^f The school is considered to be overcrowded or without available capacity if any of these conditions exist: (1) there is a seating shortage; or (2) there is a seating overage of less than or equal to a "safety margin" of 20 seats.

^g Belmont Zone of Choice high schools include: Contreras Learning Center—Academic Leadership Community, Ramon C. Cortines School of Visual & Performing Arts, Miguel Contreras Learning Complex—Business and Tourism, Miguel Contreras Learning Complex—School of Social Justice, Belmont Senior High, Edward R. Roybal Learning Center, and Miguel Contreras Learning Complex—Los Angeles School of Global Studies.

Source: Letter from Rena Perez, Director of Master Planning and Demographics, LAUSD Facilities Services Division, dated October 10, 2018. See Appendix N of this Draft EIR.

The goal of the calculation of available capacity 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) there is a seating shortage; or (2) there is currently a seating overage of less than or equal to 20 seats.

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

**Table IV.K.3-2
Projected Enrollment and Capacity of LAUSD Schools that Serve the Project Site**

School Name	Projected Resident Enrollment^a	Projected Seating Overage/(Shortage)^b	Overcrowding Projected in Future?^c
Castelar Street Elementary	646	78	No
Nightingale Middle School	1,196	(346)	Yes
Belmont Zone of Choice High Schools ^d	6,641	(47)	Yes
<p>^a 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>^b According to the LAUSD, projected seating overage/(shortage) is projected capacity minus projected resident enrollment.</p> <p>^c The school is projected to be overcrowded or without available capacity if any of these conditions exist: (1) there will be a capacity shortage in the future; or (2) there will be a capacity overage of less than or equal to a "safety margin" of 20 seats.</p> <p>^d Belmont Zone of Choice high schools include: Contreras Learning Center—Academic Leadership Community, Ramon C. Cortines School of Visual & Performing Arts, Miguel Contreras Learning Complex—Business and Tourism, Miguel Contreras Learning Complex—School of Social Justice, Belmont Senior High, Edward R. Roybal Learning Center, and Miguel Contreras Learning Complex—Los Angeles School of Global Studies.</p> <p>Source: Letter from Rena Perez, Director of Master Planning and Demographics, LAUSD Facilities Services Division, dated October 10, 2018. See Appendix N of this Draft EIR.</p>			

(i) Castelar Street Elementary

Castelar Street Elementary is located at 840 Yale Street, approximately 0.7 mile east of the Project Site, and offers instruction for Grades K–5 on a single-track calendar. As summarized in Table IV.K.3-1 on page IV.K.3-8, during the 2017–2018 academic year, Castelar Street Elementary had a total capacity for 724 students, a residential enrollment of 625 students, and an actual enrollment of 671 students, resulting in an excess of 99 seats. Castelar Street Elementary is not considered overcrowded under existing conditions.

As shown in Table IV.K.3-2, five-year projections by the LAUSD for Castelar Street Elementary indicate that the school would have a projected enrollment of 646 students and an excess of 78 seats. Therefore, Castelar Street Elementary would not be considered overcrowded under future conditions.

(ii) Nightingale Middle School

Nightingale Middle School is located at 3311 North Figueroa Street, approximately 2.7 miles northeast of the Project Site, and offers instruction for Grades 6–8 on a single-

track calendar. As shown in Table IV.K.3-1 on page IV.K.3-8, during the 2017–2018 academic year, Nightingale Middle School had a total capacity for 850 students, a residential enrollment of 1,530 students, and an actual enrollment of 805 students, resulting in a shortage of 680 seats. Therefore, Nightingale Middle School is considered overcrowded under existing conditions.

As shown in Table IV.K.3-2 on page IV.K.3-9, five-year projections by the LAUSD for Nightingale Middle School indicate that the school is projected to have a residential enrollment of 1,196 students, resulting in a shortage of 346 seats. Therefore, Nightingale Middle School would be considered overcrowded under future conditions.

(iii) Belmont Zone of Choice High Schools

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

Students living in the Belmont Zone of Choice area are allowed to apply for one of the Belmont Zone of Choice high schools, which include: Contreras Learning Center—Academic Leadership Community, Ramon C. Cortines School of Visual & Performing Arts, Miguel Contreras Learning Complex—Business and Tourism, Miguel Contreras Learning Complex—School of Social Justice, Belmont Senior High, Edward R. Roybal Learning Center, and Miguel Contreras Learning Complex—Los Angeles School of Global Studies.

As shown in Table IV.K.3-1, during the 2017–2018 academic year, Belmont Zone of Choice high schools had a total capacity for 6,594 students, a residential enrollment of 6,925 students, and an actual enrollment of 4,967 students, resulting in a shortage of 331 seats. Therefore, Belmont Zone of Choice high schools are considered overcrowded under existing conditions.

As summarized in Table IV.K.3-2, LAUSD's five-year projection for Belmont Zone of Choice high schools indicates that the schools are projected to have an enrollment of 6,641 students, resulting in a shortage of 47 seats. Therefore, Belmont Zone of Choice high schools are projected to experience overcrowding in the future.

¹¹ LAUSD, *About Zones of Choice*, <https://achieve.lausd.net/Page/1888>, accessed November 18, 2020.

(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.¹² 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 who wishes to attend from any area within the LAUSD. If a charter school has more new applications than it can accommodate, it must hold a lottery.¹³ LAUSD has over 277 independent and affiliated charter schools within its jurisdiction, serving over 138,000 students in Grades K–12.¹⁴ The charter schools in the vicinity of the Project Site include: Alliance Ted K. Tajima High School, Camino Nuevo Charter Academy Burlington, Camino Nuevo High School Miramar, Gabriella Charter School, Jardin de la Infancia, Los Angeles Academy of Arts and Enterprise, Metro Charter School, and New Academy Science and Art.¹⁵

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.¹⁶

¹² LAUSD, *K–12 Open Enrollment*, <https://achieve.lausd.net/domain/640>, accessed November 18, 2020.

¹³ LAUSD Charter Schools Division, *About Charter Schools*, <http://achieve.lausd.net/Page/1816>, accessed November 18, 2020.

¹⁴ LAUSD Charter Schools Division, *About Charter Schools*, <http://achieve.lausd.net/Page/1816>, accessed November 18, 2020.

¹⁵ California Charter Schools Association, *Find a Charter School*, www.ccsa.org/schools/, accessed November 18, 2020.

¹⁶ Letter from Rena Perez, Director of Master Planning and Demographics, LAUSD Facilities Services Division, dated October 10, 2018. See Appendix N of this Draft EIR.

(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 310 magnet programs located within the LAUSD.¹⁷ Schools in the vicinity of the Project Site that offer magnet programs include the Business, Fashion, and Electronic Information magnets at Downtown Magnets High School, the Innovative Cinematic and Music Production Magnet at the Edward R Royball Learning Center, the Science, Technology, and the Math Magnet at Plasencia Elementary School.¹⁸ 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.¹⁹ Pilot schools were established in February 2007 when a Memorandum of Understanding was ratified by 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 ten 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.²⁰ A second MOU was ratified by LAUSD and the United Teachers Los Angeles for an additional 20 Pilot Schools district-wide.²¹ Currently, there are 46 pilot schools located within the LAUSD.²²

¹⁷ LAUSD, *Unified Enrollment, What are Magnet Programs*, <https://echoices.lausd.net/magnet#gsc.tab=0>, dated November 18, 2020.

¹⁸ LAUSD, *Magnet Maps, Local District Central Magnet Map*.

¹⁹ LAUSD, *Office of School Design Options, Pilot, Overview*, <https://achieve.lausd.net/Page/2841>, accessed November 18, 2020.

²⁰ LAUSD, *Office of School Design Options, Pilot, Overview*, <https://achieve.lausd.net/Page/2841>, accessed November 18, 2020.

²¹ LAUSD, *Office of School Design Options, Pilot, Overview*, <https://achieve.lausd.net/Page/2841>, accessed November 18, 2020.

²² LAUSD, *Pilot Schools, 2018–2019 List of Pilot Schools*.

(f) *Proposed New Public Schools*

LAUSD's Facilities Services Division is managing a \$25.6 billion-program to build new schools to reduce overcrowding and modernize existing campuses throughout LAUSD's service area.²³ 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.²⁴ According to LAUSD, there are no new proposed public schools planned to be built in the vicinity of the Project Site.²⁵

(2) Private Schools in the Project Vicinity

Private schools can serve as alternatives to LAUSD schools. Within one mile of the Project Site, there are five private schools that offer instruction in grade levels ranging from pre-kindergarten through 12th grade.²⁶ Private facilities generally have smaller student populations and higher teacher to student ratios than their public counterparts. This information is presented for factual purposes only, as it does not directly relate to current and future enrollment capacity levels 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 (i.e., schools), need for new or physically altered governmental facilities, the construction of which would cause significant environmental

²³ LAUSD, Facilities Services Division, FSD Bond Program, <http://laschools.org/new-site/>, accessed November 18, 2020.

²⁴ LAUSD, Facilities Services Division, FSD Bond Program, <http://laschools.org/new-site/>, accessed November 18, 2020.

²⁵ Letter from Rena Perez, Director of Master Planning and Demographics, LAUSD Facilities Services Division, dated October 10, 2018. See Appendix N of this Draft EIR.

²⁶ Private School Review, Schools Within One Mile of the Project Site, www.privateschoolreview.com, accessed December 17, 2019. It is noted that Praada Academy is not located within one mile of the Project Site. This listing appears to be a P.O. Box address only for a school located elsewhere.

impacts, in order to maintain acceptable service ratios 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 question.

The L.A. CEQA Thresholds Guide identifies the following criteria to evaluate impacts to 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 LAUSD to accommodate the student population that would be generated by the Project (i.e., whether enrollment would exceed capacity and new or physically altered facilities would be required). The anticipated number of students that would be generated by the Project was calculated by applying the rates from the 2018 LAUSD Developer Fee Justification Study.²⁷

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

²⁷ LAUSD, 2018 Developer Fee Justification Study, March 2018.

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. Furthermore, this analysis is conservative as it does not account for private schools or other public school options, such as charter schools and magnet schools in the Project area that could also serve Project residents. This analysis also does not account for the Project's future residents who may already reside in the school attendance boundaries and would move to the Project Site.²⁸

c. Project Design Features

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

d. Analysis of Project Impacts

As set forth in Section II, Project Description, of this Draft EIR, the Project proposes two development scenarios—the Mixed Use Development Scenario and the No-Hotel Development Scenario. Under the Mixed Use Development Scenario, up to 737 residential units, up to 180 hotel rooms, up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor area are proposed. Under the No-Hotel Development Scenario, a maximum of up to 827 residential units would be constructed along with up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor area. The additional residential units (under the No-Hotel Development Scenario) would be located in the Sunset Building and would replace the 180 hotel rooms proposed by the Mixed Use Development Scenario. Regardless of the removal of the hotel, the Project design would remain as proposed. Specifically, the total floor area, building heights, massing, and footprint would be the same under both development scenarios. In addition, construction activities including depth of excavation, overall amount of grading, and the types of equipment to be used would be the same under both development scenarios. Both development scenarios are evaluated in the following analysis.

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

²⁸ 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.

acceptable service ratios or other performance objectives for schools?

(1) Impact Analysis

(a) Construction

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. **Therefore, the construction employment generated by the Project would not result in a material increase in the resident population or a corresponding demand for schools in the vicinity of the Project Site which could result in the need for new or physically altered schools in the vicinity of the Project Site, and construction-related impacts would be less than significant.**

(b) Operation

As shown in Table IV.K.3-3 on page IV.K.3-17, using the applicable LAUSD student generation rates for proposed land uses, the Mixed Use Development Scenario is anticipated to generate up to 446 new students, consisting of 241 elementary school students (Grades K–5), 67 middle school students (Grades 6–8), and 138 high school students (Grades 9–12). As shown in Table IV.K.3-4 on page IV.K.3-18, the No-Hotel Development Scenario is anticipated to generate up to 460 new students, consisting of 249 elementary school students (Grades K–5), 68 middle school students (Grades 6–8), and 143 high school students (Grades 9–12).

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 estimate presented above 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-generated 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;

Table IV.K.3-3
Estimated Number of Students Generated by the Mixed Use Development Scenario

Land Use	Units	Students Generated ^a			
		Castelar Street Elementary (K–5)	Nightingale Middle School (6–8)	Belmont Zone of Choice High Schools (9–12) ^b	Total
Proposed					
Residential	737 du	168	46	96	310
Hotel	85,000 sf (180 rm)	12	4	7	23
Office	48,000 sf	29	8	17	54
Commercial (Retail/Restaurant)	95,000 sf	32	9	18	59
Project Student Generation		241	67	138	446

du = dwelling units

sf = square feet

Note that numbers may not add up exactly due to rounding.

^a Based on student generation factors provided in the LAUSD Developer Fee Justification Study, Table 15, March 2018. 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 hotel uses, the student generation rate of 0.254 student per 1,000 square feet for "Lodging" is applied. For the Project's office uses, the student generation rate of 1.077 student per 1,000 square feet for "Standard Commercial Office" is applied. For the Project's commercial uses, 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).

^b Belmont Zone of Choice high schools include: Contreras Learning Center—Academic Leadership Community, Ramon C. Cortines School of Visual & Performing Arts, Miguel Contreras Learning Complex—Business and Tourism, Miguel Contreras Learning Complex—School of Social Justice, Belmont Senior High, Edward R. Roybal Learning Center, and Miguel Contreras Learning Complex—Los Angeles School of Global Studies.

Source: Eyestone Environmental, 2020.

- Magnet schools and centers (such as the Business, Fashion, and Electronic Information magnets at Downtown Magnets High School, the Innovative Cinematic and Music Production Magnet at the Edward R Royball Learning Center, the Science, Technology, and the Math Magnet at Plasencia Elementary School), which are open to qualified students in the LAUSD;

Table IV.K.3-4
Estimated Number of Students Generated by the No-Hotel Development Scenario

Land Use	Units	Students Generated ^a			
		Castelar Street Elementary (K–5)	Nightingale Middle School (6–8)	Belmont Zone of Choice High Schools (9–12) ^b	Total
Proposed					
Residential	827 du	188	51	108	347
Office	48,000 sf	29	8	17	54
Commercial (Retail/Restaurant)	95,000 sf	32	9	18	59
Project Student Generation		249	68	143	460

du = dwelling units

sf = square feet

Note that numbers may not add up exactly due to rounding.

^a Based on student generation factors provided in the LAUSD Developer Fee Justification Study, Table 15, March 2018. 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 office uses, the student generation rate of 1.077 student per 1,000 square feet for "Standard Commercial Office" is applied. For the Project's commercial uses, 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).

^b Belmont Zone of Choice high schools include: Contreras Learning Center—Academic Leadership Community, Ramon C. Cortines School of Visual & Performing Arts, Miguel Contreras Learning Complex—Business and Tourism, Miguel Contreras Learning Complex—School of Social Justice, Belmont Senior High, Edward R. Roybal Learning Center, and Miguel Contreras Learning Complex—Los Angeles School of Global Studies.

Source: Eyestone Environmental, 2020.

- 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.²⁹ The LAUSD provides transportation to all students enrolled in the Permits With Transportation Program regardless of where they live within the LAUSD;

²⁹ 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
- Childcare 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 childcare agency, private organization, or a verifiable childcare provider.

Based on existing enrollment and capacity data from LAUSD, Castelar Street Elementary, Nightingale Middle School, and the Belmont Zone of Choice high schools would not have adequate capacity to accommodate the new students that could be generated by either development scenario under existing conditions. Specifically, under the Mixed Use Development Scenario, Castelar Elementary School would have a shortage of 142 seats (i.e., the existing excess capacity of 99 seats minus the Project-generated 241 students), Nightingale Middle School would have a shortage of 747 seats (i.e., the existing shortage of 680 seats plus the Project-generated 67 students), and the Belmont Zone of Choice high schools would have a shortage of 469 seats (i.e., the existing shortage of 331 seats plus the Project-generated 138 students). Under the No-Hotel Development Scenario, Castelar Elementary School would have a shortage of 150 seats (i.e., the existing excess capacity of 99 seats minus the Project-generated 249 students), Nightingale Middle School would have a shortage of 748 seats (i.e., the existing shortage of 680 seats plus the Project-generated 68 students), and the Belmont Zone of Choice high schools would have a shortage of 474 seats (i.e., the existing shortage of 331 seats plus the Project-generated 143 students).

In considering projected future capacity data from LAUSD, similar to existing conditions, none of the Project-serving schools would have adequate capacity to accommodate the new students generated by the either development scenario under projected future conditions. Specifically, under the Mixed Use Development Scenario, Castelar Street Elementary School would have a shortage of 163 seats (i.e., the future excess capacity of 78 seats minus the Project-generated 241 students), Nightingale Middle School would have a shortage of 413 seats (i.e., the future shortage of 346 seats plus the Project-generated 67 students) and the Belmont Zone of Choice high schools would have a shortage of 185 seats (i.e., the future shortage of 47 seats plus the Project-generated 138 students) under projected future conditions. Under the No-Hotel Development Scenario, Castelar Street Elementary School would have a shortage of 171 seats (i.e., the future excess capacity of 78 seats minus the Project-generated 249 students), Nightingale Middle School would have a shortage of 414 seats (i.e., the future shortage of 346 seats plus the Project-generated 68 students), and the Belmont Zone of Choice high schools would have

a shortage of 190 seats (i.e., the future shortage of 47 seats plus the Project-generated 143 students) under projected future conditions. LAUSD does not have a capital improvement plan to address future facility needs and has not established a threshold for provision of these new facilities. LAUSD may consider presenting a local bond measure to voters in the near future to raise capital for facility modernization and new construction.³⁰ However, no new school construction is currently planned.³¹ Notwithstanding, pursuant to SB 50, the Project Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of the Project's building permit. As discussed above, LAUSD collects development fees for new construction within its district boundaries. Pursuant to Government Code Section 65995(h), the payment of these fees fully removes all 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. Furthermore, the potential future school expansions necessary to accommodate growth would be subject to CEQA which requires that physical impacts on the environment be evaluated, disclosed and mitigated when feasible.

Based on the above, the Project would not 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 or other performance objectives for schools. Impacts would be less than significant.

(2) Mitigation Measures

Project-level impacts related 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 or included, and the impact level remains less than significant.

³⁰ LAUSD, *Facilities Services Division, 2017 Facilities Services Division Strategic Execution Plan*.

³¹ Letter from Rena Perez, Director of Master Planning and Demographics, LAUSD Facilities Services Division, dated October 10, 2018. See Appendix N of this Draft EIR.

e. Cumulative Impacts

As identified in Section III, Environmental Setting, of this Draft EIR, there are 89 related projects located in the vicinity of the Project Site. Of the 89 related projects, 83 related projects were identified as being located within the attendance boundaries of Castelar Street Elementary School, Nightingale Middle School, and/or Belmont Zone of Choice high schools. These 83 related projects have the potential to combine with the Project and cumulatively generate new students who would attend the aforementioned schools. Therefore, these 83 related projects are considered in this cumulative analysis.

(1) Impact Analysis

As shown in Table IV.K.3-5 on page IV.K.3-22, the 83 related projects located within the school attendance boundaries could potentially generate 9,960 new students, consisting of 1,930 Castelar Street Elementary School students, 1,654 Nightingale Middle School students, and 6,376 Belmont Zone of Choice high school students based on the rates provided in the 2018 LAUSD Developer Fee Justification Study. It should be noted that some of the related projects are only within the service area of one of the three schools within the Project Site boundary. i.e., all related projects do not fall within the boundaries of all of the schools as with the Project. As indicated above, the Mixed Use Development Scenario could generate up to 446 new students, consisting of 241 Castelar Street Elementary School students, 67 Nightingale Middle School students, and 138 Belmont Zone of Choice high school students. Therefore, the Project, in combination with the 83 applicable related projects, would have the potential to generate a cumulative total of 10,406 students consisting of 2,171 Castelar Street Elementary School students, 1,721 Nightingale Middle School students, and 6,514 Belmont Zone of Choice high school students.

The No-Hotel Development Scenario could generate up to 460 new students, consisting of 249 Castelar Street Elementary School students, 68 Nightingale Middle School students, and 143 Belmont Zone of Choice high school students. Therefore, the Project, in combination with the 83 applicable related projects, would have the potential to generate a cumulative total of 10,420 students consisting of 2,179 Castelar Street Elementary School students, 1,722 Nightingale Middle School students, and 6,519 Belmont Zone of Choice high school students.

Based on existing enrollment and capacity data from LAUSD, the schools serving the Project and the 83 related projects would not have adequate seating capacity. Specifically, with the addition of students generated by the Mixed Use Development Scenario in combination with the 83 related projects, Castelar Street Elementary School would have a shortage of 2,072 seats (i.e., the existing excess capacity of 99 seats minus the 2,171 students generated by the Project and related projects), Nightingale Middle

Table IV.K.3-5
Estimated Student Generation from Related Projects within the Attendance Boundaries of the
Schools that Serve the Project Site

No.	Project	Land Use ^{a,b,c,d}	Size	Castelar Street Elementary	Nightingale Middle School	Boyle Heights Zone of Choice
1	Bus Maintenance & Inspection Facility 454 E. Commercial St.	Bus Facility (87,120 sf)	2 ac	N/A	N/A	N/A
2	Tenten Wilshire Expansion (the Icon) 1027 W. Wilshire Blvd.	Condominiums	402 du	—	—	53
		Retail	4,728 sf	—	—	1
3	Da Vinci Apartments 327 N. Fremont Ave.	Apartments	600 du	—	—	78
		Retail	30,000 sf	—	—	6
4	1101 North Main Condos 1101 N. Main St.	Condominiums	316 du	—	20	41
5	5th & Olive (formerly Park Fifth Project) 437 S. Hill St.	Condominiums	660 du	—	—	86
		Restaurant	16,309 sf	—	—	4
6	Beverly + Lucas Project 1430 W. Beverly Blvd.	Apartments	157 du	—	—	21
		Commercial	3,500 sf	—	—	1
7	Wilshire Grand Project 900 W. Wilshire Blvd.	Hotel	889 rm	80	—	46
		Office	369,299 sf	217	—	124
		Retail/ Restaurant	34,765 sf	12	—	7
		Ancillary Space	46,170 sf	28	—	16
8	Mixed Use 1435 W. 3rd St.	Apartments	122 du	—	—	16
		Retail	3,500 sf	—	—	1
9	Grand Avenue Project 100 S. Grand Ave.	Condominiums	968 du	220	—	126
		Apartments	242 du	55	—	32
		Hotel	225 rm	21	—	12
		Retail	152,150 sf	51	—	29
		Office	650,000 sf	381	—	218
		Restaurant	52,000 sf	18	—	10
		Supermarket	53,000 sf	18	—	11
		Health Club	24,000 sf	8	—	5
		Event Facility	250 seats	N/A	—	N/A
10	LA Civic Center Office 150 N. Los Angeles St.	Office	712,500 sf	417	113	239
		Retail	35,000 sf	12	4	7
		Child Care	2,500 sf	1	1	1
11	Residential 1329 W. 7th St.	Apartments	87 du	—	—	12
12	Mixed Use 534 S. Main St.	Apartments	160 du	—	—	21
		Retail	18,000 sf	—	—	4
		Restaurant	3,500 sf	—	—	1
		Fast Food	3,500 sf	—	—	1
13	Retail/Restaurant 201 S. Broadway	Retail/ Restaurant	27,765 sf	—	—	6

Table IV.K.3-5 (Continued)
Estimated Student Generation from Related Projects within the Attendance Boundaries of the
Schools that Serve the Project Site

No.	Project	Land Use ^{a,b,c,d}	Size	Castelar Street Elementary	Nightin- gale Middle School	Boyle Heights Zone of Choice
14	Mixed Use 400 S. Broadway	Apartments	450 du	—	—	59
		Retail	6,904 sf	—	—	2
		Bar	5,000 sf	—	—	1
15	Mixed Use 601 S. Main St.	Apartments	452 du	—	—	59
		Retail	25,000 sf	—	—	5
16	La Plaza Cultura Village 527 N. Spring St.	Apartments	345 du	79	22	45
		Retail	23,000 sf	8	3	5
		Specialty Retail	21,000 sf	7	2	4
		Restaurant	11,000 sf	4	1	3
17	Mixed Use 1335 W. 1st St.	Apartments	102 du	—	—	14
		Retail	3,463 sf	—	—	1
18	Residential 401 N. Boylston St.	Apartments	101 du	—	—	14
19	Apartments 1218 W. Ingraham St.	Apartments	80 du	—	—	11
20	Mixed Use 1145 W. 7th St.	Condominiums	241 du	—	—	32
		Retail	7,291 sf	—	—	2
21	Apartments 118 S. Astronaut E.S. Onizuka St.	Apartments	77 du	—	—	10
22	Stadium Way and Chavez Ravine Apartments 959 E. Stadium Way	Apartments	158 du	—	—	—
23	Mixed Use 700 W. Cesar E. Chavez Ave.	Apartments	300 du	69	19	39
		Retail	8,000 sf	3	1	2
24	Metro Emergency Security Operations Center 410 N. Center St.	Office	110,000 sf	—	—	—
25	Medallion Phase 2 300 S. Main St.	Apartments	471 du	—	—	62
		Restaurant	27,780 sf	—	—	6
		Retail	5,190 sf	—	—	1
26	Apartments 340 N. Patton St.	Apartments	43 du	—	—	6
27	Giannini Place (Nomad Hotel) 649 S. Olive St.	Hotel	241 rm	—	—	13
28	Sapphire Mixed Use (Revised) 1111 W. 6th St.	Apartments	362 du	—	—	47
		Retail	25,805 sf	—	—	5
29	Sunset Everett Mixed Use 1185 W. Sunset Blvd.	Apartments	214 du	—	—	28
		Single-Family Homes	6 du	—	—	1
		Condominiums	6 du	—	—	1

Table IV.K.3-5 (Continued)
Estimated Student Generation from Related Projects within the Attendance Boundaries of the
Schools that Serve the Project Site

No.	Project	Land Use ^{a,b,c,d}	Size	Castelar Street Elementary	Nightin- gale Middle School	Boyle Heights Zone of Choice
30	Hotel & Apartments 675 S. Bixel St.	Apartments	422 du	—	—	55
		Hotel	126 rm	—	—	7
		Retail	4,874 sf	—	—	1
31	Spring Street Hotel 633 S. Spring St.	Hotel	176 rm	—	—	10
		Bar	5,290 sf	—	—	2
		Restaurant	8,430 sf	—	—	2
32	Everett Street (1013) Project 1013 Everett St.	Apartments	49 du	—	—	7
33	Hill Mixed Use Project 708 N. Hill St.	Apartments	162 du	37	10	21
		Retail	5,000 sf	2	1	1
34	Alpine Mixed Use 211 W. Alpine St.	Apartments	122 du	28	8	16
		Retail	7,500 sf	3	1	2
35	Beaudry Ave & 2nd Street Mixed Use Project 130 S. Beaudry Ave.	Apartments	220 du	—	—	29
		Other	9,000 sf	—	—	4
36	College Station Mixed Use 129 W. College St., 924 N. Spring St.	Apartments	770 du	—	48	100
		Commercial	51,390 sf	—	5	10
37	Apartments 422 S. Lake St.	Apartments	80 du	—	—	11
38	Title Insurance Building 433 S. Spring St.	Office	320,000 sf	—	—	107
39	Mitsui Fudosan (Eighth and Figueroa Tower) 744 S. Figueroa St.	Apartments	436 du	—	—	57
		Restaurant	3,750 sf	—	—	1
		Retail	3,750 sf	—	—	1
40	945 West 8th Street 845 W. 8th St.	Apartments	781 du	—	—	102
		Commercial	6,700 sf	—	—	2
41	Brooks Building 644 S. Broadway	Apartments	30 du	—	—	4
		Bar	2,500 sf	—	—	1
42	Ferrante 1000 W. Temple St.	Apartments	1,500 du	—	—	195
		Retail	30,000 sf	—	—	6
43	Marionette Lofts 1345 W. 1st St.	Apartments	102 du	—	—	14
44	Budokan of Los Angeles 237 S. Los Angeles St.	Sports Complex	43,453 sf	—	—	9
45	643–655 North Spring Street 643–655 N. Spring St.	Apartments	281 du	64	18	37
		Hotel	142 rm	13	4	8
		Commercial	17,003 sf	6	2	4
		Restaurant	2,532 sf	1	1	1
46	1201 North Broadway Mixed Use 1201 N. Broadway	Apartments	118 du	—	8	—
		Office	9,000 sf	—	2	—

Table IV.K.3-5 (Continued)
Estimated Student Generation from Related Projects within the Attendance Boundaries of the
Schools that Serve the Project Site

No.	Project	Land Use ^{a,b,c,d}	Size	Castelar Street Elementary	Nightin- gale Middle School	Boyle Heights Zone of Choice
47	Sunset Flats Mixed Use 2225 W. Sunset Blvd.	Condominiums	65 du	—	—	—
		Retail and Restaurant	15,550 sf	—	—	—
48	Mixed Use 1924 W. Temple St.	Condominiums	205 du	—	—	27
		Apartments	46 du	—	—	6
		Retail	19,103 sf	—	—	4
49	Barlow Hospital Replacement & Master Plan 2000 Stadium Way	Condominiums	888 du	—	—	116
		Hospital	56 beds	—	—	N/A
		Retail	15,000 sf	—	—	3
50	LA Hotel 1625 W. Palo Alto St.	Hotel	89 rm	—	—	5
51	Urban View Lofts Project 495 S. Hartford Ave.	Apartments	220 du	—	—	29
52	1316 Court & 1323 Colton Apartments 1316 W. Court St.	Apartments	60 du	—	—	8
53	433 South Main Street 433 S. Main St.	Condominiums	196 du	—	—	26
		Retail	5,300 sf	—	—	2
		Restaurant	900 sf	—	—	1
54	Tribune (L.A. Times) South Tower Project 222 W. 2nd St.	Condominiums	107 du	—	—	14
		Office	534,044 sf	—	—	179
		Retail	7,200 sf	—	—	2
55	Elysian Park Lofts 1030–1380 N. Broadway	Apartments	920 du	—	57	120
		Restaurant	16,147 sf	—	2	4
56	Mixed Use (Times Mirror Square) 100 S. Broadway	Apartments	1,127 du	—	—	—
		Office	285,088 sf	—	—	96
		Supermarket	50,000 sf	—	—	10
		Restaurant	75,589 sf	—	—	15
57	Apartments 1246 W. Court St.	Apartments	54 du	—	—	7
58	1018 West Ingraham Street 1018 W. Ingraham St.	Apartments	43 du	—	—	6
		Retail	7,400 sf	—	—	2
59	8th/Grand/Hope Project 754 S. Hope St.	Condominiums	409 du	—	—	54
		Retail	7,329 sf	—	—	2
60	4th & Spring Hotel 361 S. Spring St.	Hotel	315 rm	—	—	17
		Meeting Space	2,000 sf	—	—	1
61	Mixed Use 1800 Beverly Blvd.	Apartments	243 du	—	—	32
		Restaurant	3,500 sf	—	—	1
62	425 South Union Apartments 425 S. Union Ave.	Apartments	33 du	—	—	5
63	1301 Colton Apartments 1301 Colton St.	Apartments	29 du	—	—	4


Table IV.K.3-5 (Continued)
Estimated Student Generation from Related Projects within the Attendance Boundaries of the
Schools that Serve the Project Site

No.	Project	Land Use ^{a,b,c,d}	Size	Castelar Street Elementary	Nightin- gale Middle School	Boyle Heights Zone of Choice
64	Apartments 1301 W. Sunset Blvd.	Apartments	45 du	—	—	6
65	1346 Court Apartments 1346 W. Court St.	Apartments	43 du	—	—	6
66	Kaiser Medical Center 765 W. College St.	Medical Building Office	100,000 sf	59	16	34
67	Alameda District Plan Union Station Terminal Annex	Residential	22 du	—	2	3
		Office	7,443,200 sf	—	1173	2488
		Retail	645,000 sf	—	58	123
		Hotel	750 rm	—	19	39
		Restaurant	20,000 sf	—	2	4
		Museum	70,000 sf	—	7	14
68	Hellman/Banco Building 354 S. Spring St.	Apartments	212 du	—	—	28
69	Foreman and Clark Building 701 S. Hill St.	Apartments	165 du	—	—	22
		Restaurant	11,902 sf	—	—	3
		Restaurant	14,032 sf	—	—	3
70	Data Center 900 N. Alameda St.	Data Center	179,900 sf	—	17	35
71	Equity Residential Mixed Use 340 S. Hill St.	Apartments	406 du	—	—	53
		Affordable Apartments	22 du	—	—	3
		Office	2,980 sf	—	—	1
		Retail	2,630 sf	—	—	1
72	Mixed Use (Lifan Tower) 1235 W. 7th St.	Apartments	303 du	—	—	40
		Retail	5,960 sf	—	—	2
73	Apartments 459 S. Hartford Ave.	Affordable Apartments	101 du	—	—	14
74	Hotel 1011 N. Broadway	Hotel	92 rm	—	3	5
75	708 South New Depot Street Residential 708 S. New Depot St.	Apartments	33 du	8	3	5
76	Mixed Use 1322 W. Maryland St.	Apartments	47 du	—	—	7
		Retail	760 sf	—	—	1
77	5th & Hill 323 W. 5th St.	Hotel	190 rm	—	—	10
		Meeting Room	6,100 sf	—	—	1
		Apartments	31 du	—	—	5
		Restaurant	29,200 sf	—	—	6
78	Restaurant & Retail 1455 N. Alvarado St.	Restaurant	5,050 sf	—	—	—
		Retail	2,984 sf	—	—	—

Table IV.K.3-5 (Continued)
Estimated Student Generation from Related Projects within the Attendance Boundaries of the
Schools that Serve the Project Site

No.	Project	Land Use ^{a,b,c,d}	Size	Castelar Street Elementary	Nightingale Middle School	Boyle Heights Zone of Choice
79	Men's Central Jail Replacement 441 E. Bauchet St.	Prison	3,885 beds	—	N/A	N/A
80	Residential 2335 W. Temple St.	Apartments	71 du	—	—	10
81	Restaurant & Theater 2139 W. Sunset Blvd.	Restaurant and Theater	5,979 sf	—	—	—
82	Restaurants 1453 N. Alvarado St.	Building to House 6 restaurants with Surface Parking	7,300 sf	—	—	—
83	Apartments 740 S. Hartford Ave.	Apartments	80 du	—	—	11
84	Condominiums 742 S. Hartford Ave.	Condominiums	42 du	—	—	6
85	Apartments & Retail 1324 W. Wilshire Blvd.	Apartments	50 du	—	—	7
		Retail	5,730 sf	—	—	2
86	Community Center 445 W. Cottage Home St.	Community Center	8,530 sf	—	1	1
87	Apartments 418 N. Alvarado St.	Apartments	73 du	—	—	10
88	Condominiums 1100 W. Temple St.	Condominiums	53 du	—	—	7
89	Mixed Use 1150 W. Wilshire Blvd.	Condominiums	140 du	—	—	19
		Retail and Restaurant	9,115 sf.	—	—	2
Mixed Use Development Scenario						
Related Total				1,930	1,654	6,376
Mixed Use Development Scenario Total				241	67	138
Related + Mixed Use Development Scenario Total				2,171	1,721	6,514
No-Hotel Development Scenario						
Related Total				1,930	1,654	6,376
No-Hotel Development Scenario Total				249	68	143
Related + No-Hotel Development Scenario Total				2,179	1,722	6,519
^a ac = acres ^b du = dwelling units ^c rm = rooms ^d sf = square feet						

Table IV.K.3-5 (Continued)
Estimated Student Generation from Related Projects within the Attendance Boundaries of the
Schools that Serve the Project Site

No.	Project	Land Use ^{a,b,c,d}	Size	Castelar Street Elementary	Nightingale Middle School	Boyle Heights Zone of Choice
<p>N/A = No generation rate available</p> <p> = Related projects not located within the attendance boundaries of at least one of the schools serving the Project Site (i.e., Castelar Street Elementary, Nightingale Middle School, and Belmont Zone of Choice) are not included in this analysis of cumulative impacts to schools.</p> <p>All totals have been rounded to the nearest whole number and may not sum due to rounding.</p> <p>^a Based on student generation factors provided in the LAUSD Developer Fee Justification Study, Table 15, March 2018. 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 retail, restaurant, and commercial uses, the student generation rate of 0.610 student per 1,000 square feet for “Neighborhood Shopping Center” is applied. For office uses, the student generation rate of 1.077 student per 1,000 square feet for “Standard Commercial Office” is applied. For hotel uses, the student generation rate of 0.254 student per 1,000 square feet for “Lodging” is applied.</p> <p>^b The 2018 LAUSD Developer Fee Justification Study does not provide a student generation factor for ancillary space, meeting space, meeting rooms, museums, data centers, or community centers. Therefore, the highest available rate for comparable land uses is applied.</p> <p>^c The 2018 LAUSD Developer Fee Justification Study does not provide a student generation factor for prisons per bed, bus facilities, event facilities by seat, or hospitals by bed.</p> <p>^d For student generation from hotel uses, a square footage rate of 650 square feet per room is applied. (J.A. deRoos, 2011, Planning and programming a hotel, http://scholarship.sha.cornell.edu/articles/310, retrieved December 17, 2019.)</p> <p>Source: Eyestone Environmental, 2020.</p>						

School would have a shortage of 2,401 seats (i.e., the existing shortage of 680 seats in addition to the 1,721 students generated by the Project and related projects), and Belmont Zone of Choice high schools would have a shortage of 6,845 seats (i.e., the existing shortage of 331 seats in addition to the 6,514 students generated by the Project and related projects). With the addition of the students generated by the No-Hotel Development Scenario in combination with the 83 related projects, Castelar Street Elementary School would have a shortage of 2,080 seats (i.e., the existing excess capacity of 99 seats minus the 2,179 students generated by the Project and related projects), Nightingale Middle School would have a shortage of 2,402 seats (i.e., the existing shortage of 680 seats in addition to the 1,722 students generated by the Project and related projects), and Belmont Zone of Choice high schools would have a shortage of 6,850 seats (i.e., the existing shortage of 331 seats in addition to the 6,519 students generated by the Project and related projects).

With regard to projected future capacity data from LAUSD, under the Mixed Use Development Scenario, Castelar Street Elementary School would have a shortage of 2,093 seats (i.e., the future excess of 78 seats minus the 2,171 students generated by the Project and related projects), Nightingale Middle School would experience a shortage of

2,067 seats (i.e., future shortage of 346 seats in addition to the 1,721 students generated by the Project and related projects), and Belmont Zone of Choice high schools would have a shortage of 6,561 seats (i.e., the future shortage of 47 seats minus the 6,514 students generated by the Project and related projects). Under the No-Hotel Development Scenario, Castelar Street Elementary School would have a shortage of 2,101 seats (i.e., the future excess of 78 seats minus the 2,179 students generated by the Project and related projects). Nightingale Middle School would experience a shortage of 2,068 seats (i.e., future shortage of 346 seats in addition to the 1,722 students generated by the Project and related projects) and Belmont Zone of Choice high schools would have a shortage of 6,566 seats (i.e., the future shortage of 47 seats minus the 6,519 students generated by the Project and related projects).

Based on the above, when compared to both existing conditions and projected school capacities, the students generated by the Project, in combination with the 83 applicable related projects within the school attendance boundaries, would cause seating shortages at Castelar Street Elementary School, Nightingale Middle School, and Belmont Zone of Choice high schools. This degree of cumulative growth would increase the enrollment for LAUSD schools in the Project Site vicinity, which could result in a need for new school facilities in the future. However, the Project would comprise a small percentage (i.e., approximately 4.48 percent under the Mixed Use Development and 4.62 percent under the No-Hotel Development Scenario) of the total cumulative growth in students. As previously noted, LAUSD may consider presenting a local bond measure to voters in the near future to raise capital for facility modernization and new construction.³² However, no new school construction is currently planned.³³ Nevertheless, 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. As discussed above, LAUSD collects development fees for new construction within its district boundaries. Pursuant to Government Code Section 65995(h), the payment of these fees would be considered full and complete mitigation of all school impacts generated by the Project and related projects.

Based on the above, the Project and related projects would not result in significant cumulative 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 service. As such, the Project's

³² LAUSD, *Facilities Services Division, 2017 Facilities Services Division Strategic Execution Plan*.

³³ Letter from Rena Perez, Director of Master Planning and Demographics, LAUSD Facilities Services Division, dated October 10, 2018. See Appendix N of this Draft EIR.

contribution would not be cumulatively considerable, and cumulative impacts on schools would be less than significant.

(2) Mitigation Measures

Cumulative impacts related 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 or included, and the impact level remains less than significant.