

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

2. Environmental Setting

a. Regulatory Framework

(1) Federal Level

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

(2) State Level

(a) California Education Code

The facilities and services of the LAUSD are subject to the rules and regulations of the California Education Code and governance of the State Board of Education. Traditionally, the State has passed legislation for the funding of local and public schools and provided the majority of monies to fund education in the State. To assist in providing facilities to serve students generated from new development projects, the State passed Assembly Bill (AB) 2926 in 1986, allowing school districts to collect impact fees from developers of new residential, commercial, and industrial developments. Development impact fees are also referenced in the 1987 Leroy Greene Lease-Purchase Act, which requires school districts to contribute a matching share of the costs for the construction,

modernization, or reconstruction of school facilities. Subsequent legislation modified the fees structure and general guidelines.

(b) School Bonds

(i) 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, the Kindergarten–University Public Education Facilities Bond Act of 1998, 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.^{1,2}

In addition, SB 50 allows governing boards of school districts to establish fees to offset costs associated with school facilities made necessary by new construction. Pursuant to SB 50, the LAUSD collects development fees for new construction within its district boundaries. Currently, LAUSD collects the maximum new school construction facility fee at a rate of \$3.79 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.³ Payment of the LAUSD new school construction facility fee is required prior to issuance of building permits. Pursuant to California Government Code Section 65995, the payment of these fees by a developer serves to fully mitigate all potential project impacts on school facilities to less than significant levels.

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

² *As of July 2, 2018, Proposition 1A funding has a balance remaining for its hardship program. Source: State of California, Strategic Growth Plan, Bond Accountability, Bond Information, Education, DGS: Office of Public School Construction: Proposition 1A (Nov. 1998) Summary, www.dgsapps.dgs.ca.gov/opsc/bondac/proposition/proposition1A.asp, accessed March 12, 2020.*

³ *Los Angeles Department of Building and Safety, Permit Fee Estimate, <http://netinfo.ladbs.org/feecalculator/3950786566dd7fcc88258152007def26?OpenForm>, accessed March 12, 2020.*

(ii) Propositions 47, 55, and 1D

Proposition 47, the Kindergarten-University Public Education Facilities Bond Act of 2002, was approved by voters in November 2002. This proposition provided \$11.4 billion in general obligation bonds for K–12 facilities through the School Facility Program, as well as funding for new programs, charter school facilities, critically overcrowded schools, joint-use projects, and small high schools.⁴ Proposition 55, the Kindergarten-University Public Education Facilities Bond Act of 2004, was passed in March 2004, providing an additional \$10 billion in general obligation bonds for the construction and renovation of K–12 school facilities. These funds are made available through the School Facility Program, and continue to assisting school districts with overcrowding, accommodating future enrollment growth and repairing and modernization older facilities.⁵ Proposition 1D, the Kindergarten-University Public Education Facilities Bond Act of 2006, was placed on the November 2006 ballot as a result of Governor Schwarzenegger signing AB 127 (Chapter 35, Statutes of 2006) into law on May 20, 2006. Proposition 1D was approved by voters in November 2006, providing \$10.4 billion in general obligation bonds for educational facilities, of which \$7.3 billion is earmarked for grades K–12 projects.⁶

(c) Property Tax

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

(3) Regional/Local Levels*(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. The LAUSD operates under the policy direction of an elected governing district school board (elected from the local area), as well as by local propositions which directly impact the funding of

⁴ State of California, *Strategic Growth Plan, Bond Accountability, Bond Information, Education, DGS: Office of Public School Construction: Proposition 47 (Nov. 2002) Summary*, www.dgsapps.dgs.ca.gov/opsc/bondac/proposition/proposition47.asp, accessed March 12, 2020.

⁵ State of California, *Strategic Growth Plan, Bond Accountability, Bond Information, Education, DGS: Office of Public School Construction: Proposition 55 (Mar. 2004) Summary*, www.dgsapps.dgs.ca.gov/opsc/bondac/proposition/proposition55.asp, accessed March 12, 2020.

⁶ State of California, *Strategic Growth Plan, Bond Accountability, Bond Information, Education, DGS: Office of Public School Construction: Proposition 1D (Nov. 2006) Summary*, www.dgsapps.dgs.ca.gov/opsc/bondac/proposition/proposition1D.asp, accessed March 12, 2020.

facility construction and maintenance. Pursuant to SB 50, the LAUSD collects developer fees for new construction within its district boundaries.

(i) LAUSD Facilities Services Division Bonds⁷

The bond programs managed by the LAUSD Facilities Services Division are largely funded with local and State bonds (discussed above) that were approved by voters over the course of several years. In April 1997, voters approved the first local bond in 34 years, Proposition BB, which allocated \$2.4 billion for the modernization of facilities and addition of classroom space. Voters then approved local Measure K with \$3.35 billion in local funding in November 2002. This funding was designated for charter school facilities, critically overcrowded schools, and joint use projects. Voters also approved local Measure R in March 2004 and local Measure Y in November 2005 to provide \$3.87 billion and \$3.985 billion, respectively, for new school construction, modernization, and repair. Local Measure Q was approved by voters in November 2008 to provide \$7 billion for repairing aging schools, upgrading schools to modern technology, creating additional capacity, promoting a healthier environment, and ensuring transparency and accountability.

(ii) LAUSD Strategic Plan 2016–2019

The LAUSD Strategic Plan 2016–2019 (Strategic Plan) represented the LAUSD's framework towards a commitment to 100 percent graduation. In following the Strategic Plan's fundamental strategy, the LAUSD directed 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.

Furthermore, the Strategic Plan provided key initiatives to achieve these commitments from which implementation plans will be created. Plans were structured to include specific action steps, responsibilities, and timelines. As such, the LAUSD was able to monitor and measure progress and provide accountability during the Strategic Plan's implementation process.

(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.⁸ Open enrollment transfers are issued on a space-

⁷ LAUSD Facilities Services Division, *Facilities Services Division Strategic Execution Plan 2017*.

⁸ LAUSD, *K-12 Open Enrollment*, <https://achieve.lausd.net/Page/11003>, accessed March 12, 2020.

available basis only. No student living in a particular school's attendance area will be displaced by a student requesting an open enrollment transfer. Open enrollment seats are granted through an application process that is completed before the school year begins.

(c) Charter Schools

Charter schools originated from the Charter School Act of 1992. Typically, a charter school is granted by the LAUSD Board of Education and approved by the state for a period of up to five years. LAUSD maintains two types of charter schools: conversion charters, which are existing LAUSD schools that later become charters; and start-ups, which are charter schools that are newly created by any member of the public (e.g., educators, parents, foundations, and others). Charter schools are open to any student who wishes to attend from any area within LAUSD. If a charter school has more new applications than it can accommodate, it must hold a lottery.⁹

(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 curricula and instructional approaches to attract a voluntary integration of students from a variety of neighborhoods. Magnet programs typically establish a unique focus, such as gifted and talented, math and science, performing arts, or basic skills programs. Some magnet programs occupy entire school sites, while other magnet centers are located on regular school campuses with access to activities and experiences shared with the host school.

b. Existing Conditions

(1) Los Angeles Unified School District

LAUSD serves an area of approximately 710 square miles that includes the City of Los Angeles, all or portions of 26 additional cities, and several unincorporated areas of Los Angeles County.¹⁰ During the current 2019–2020 school year, LAUSD is providing kindergarten through high school (Grades K–12) education to approximately 673,849 students enrolled throughout 1,386 schools and centers. These include 19 primary school centers, 441 elementary schools, 79 middle schools, 92 high schools, 54 option schools, 53 magnet schools, 25 multi-level schools, 13 special education schools, two home/hospital centers, 239 magnet centers on regular campuses (Grades K–12), 228 charter

⁹ LAUSD Charter Schools Division, *About Charter Schools*, <http://achieve.lausd.net/Page/1816>, accessed March 12, 2020.

¹⁰ LAUSD, *Fingertip Facts 2019–2020*.

schools, and 142 other schools and centers.¹¹ The LAUSD is divided into six local districts, and the Project Site is located in the East Local District.¹²

As discussed above, California 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. Proposition 1D, which was approved by voters in November 2006, provides \$10.4 billion in general obligation bonds for educational facilities, of which \$7.3 billion is earmarked for grades K–12 projects.¹³ As of September 2017, the LAUSD has received priority funding apportionments by the State Department of General Services—Office of Public School Construction from Propositions 47, 1D, and 51.¹⁴ As of January 2019, the LAUSD also continues to participate in requests for priority funding.¹⁵

The LAUSD's voter-approved Bond Program is currently valued at \$27.5 billion. The LAUSD Facilities Services Division is managing a \$25.6 billion program to reduce overcrowding and modernize existing campuses.¹⁶ Using these funding sources, LAUSD has implemented the New School Construction Program, a multi-year capital improvement program. The goals of the New School Construction Program are to: eliminate involuntary busing of students out of their home attendance areas, operate all schools on a traditional two-semester calendar, and implement full-day kindergarten throughout LAUSD. Through the New School Construction Program, LAUSD has delivered over 170,000 new 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

¹¹ LAUSD, *Fingertip Facts 2019–2020*.

¹² LAUSD, *Facilities Services Division, Local District East Map*.

¹³ State of California, *Strategic Growth Plan, Bond Accountability, Bond Information, Education, DGS: Office of Public School Construction: Proposition 1D (Nov. 2006) Summary*, www.dgsapps.dgs.ca.gov/opsc/bondac/proposition/proposition1D.asp, accessed March 12, 2020.

¹⁴ State of California, Department of General Services, Office of Public School Construction, *School Facility Program, Projects Receiving Priority Funding Apportionments, State Allocation Board Meeting, September 6, 2017*.

¹⁵ State of California, Department of General Services, Office of Public School Construction, *Priority Funding Request Acceptance List as of January 2, 2019*.

¹⁶ LAUSD Facilities Services Division, www.laschools.org/new-site/, accessed March 12, 2020.

critical repairs, safety issues, resource conservation, and technology upgrades through the School Upgrade Program.¹⁷

(a) Public Schools

As shown in Figure IV.H.3-1 on page IV.H.3-8 and as identified by the LAUSD Facilities Services Division, the public schools that serve the Project Site include 9th Street Elementary School, Hollenbeck Middle School, and Boyle Heights Zone of Choice high schools.¹⁸ These schools currently operate under a single-track calendar in which instruction generally begins in mid-August and continues through early June. Table IV.H.3-1 on page IV.H.3-9 presents school capacity, enrollment, and seating shortages/overages for each of these schools during the 2017–2018 school year. 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.¹⁹ 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 at the start of the reported school year, including magnet students. Actual enrollment is defined as the number of students actually attending the school at the start of the reported school year, 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. The LAUSD considers a school to be overcrowded if any one of the following occurs: (1) there is currently a capacity shortage; or (2) there is currently a capacity overage of less than or equal to a margin of 20 seats.

The LAUSD also projects the future enrollment of its schools for the next five years.²⁰ Table IV.H.3-2 on page IV.H.3-10 shows the LAUSD's projections for each of the schools serving the Project Site vicinity, which are further discussed below.

¹⁷ LAUSD, *Facilities Services Division, Facilities Services Division Strategic Execution Plan 2019*.

¹⁸ Letter from Rena Perez, Director of Master Planning & Demographics, LAUSD Facilities Services Division, dated July 25, 2018. See Appendix K of this Draft EIR.

¹⁹ Letter from Rena Perez, Director of Master Planning & Demographics, LAUSD Facilities Services Division, dated July 25, 2018. See Appendix K of this Draft EIR.

²⁰ As described in Section II, *Project Description*, of this Draft EIR, Project construction is anticipated to be completed in 2024. However, LAUSD projects future enrollment in five-year increments based on the most recent school year for which data is available at the time the service letter is written, which was the 2017–2018 school year. Therefore, projected future enrollment data considered in this analysis is for the 2022–2023 school year. Source: Letter from Rena Perez, Director of Master Planning & Demographics, LAUSD Facilities Services Division, dated July 25, 2018. See Appendix K of this Draft EIR.

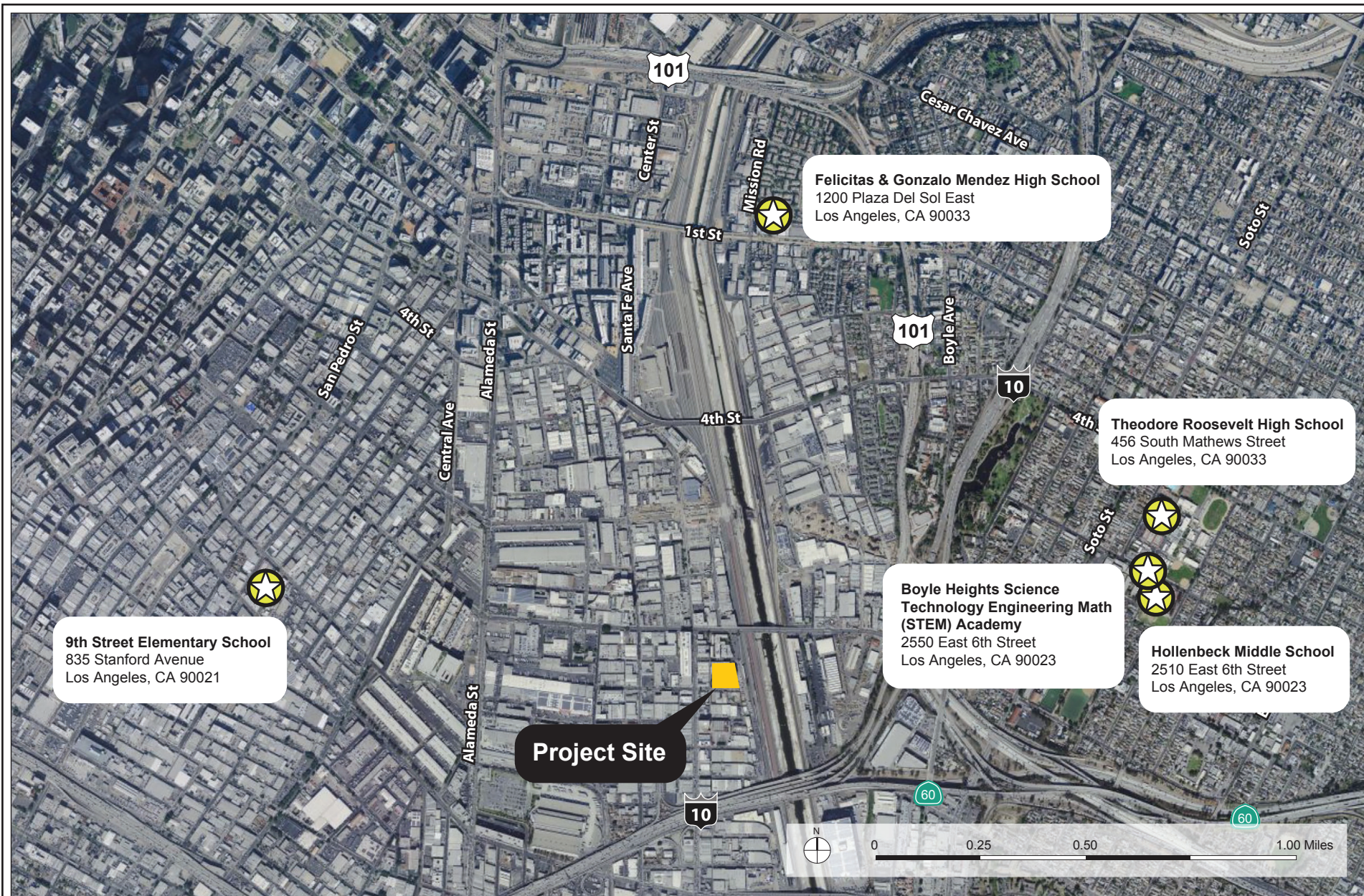


Figure IV.H.3-1
Schools Serving the Project Vicinity

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

School Name	Capacity^a	Resident Enrollment^b	Actual Enrollment^c	Current Seating Overage/ (Shortage)^d	Overcrowded Now^e
9th Street Elementary School	375	292	347	83	No
Hollenbeck Middle School	1,032	1,433	1,017	(401)	Yes
Boyle Heights Zone of Choice Schools ^f	2,883	3,570	2,568	(687)	Yes
<p>^a School's operating capacity, or the maximum number of students the school can serve with the school's classroom utilization. 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 at the start of the reported school year, plus students enrolled at any on-site magnet centers.</p> <p>^c Number of students actually attending the school at the start of the reported school year, 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 has a seating shortage, or there is a seating overage of less than or equal to a margin of 20 seats.</p> <p>^f Schools and programs that are part of a "school choice area" pull enrollments from the area school(s) that have resident attendance boundaries. Seating overage/shortage and overcrowding is calculated and reported for the school choice area as a whole.</p> <p>Source: Letter from Rena Perez, Director of Master Planning & Demographics, LAUSD Facilities Services Division, dated July 25, 2018. See Appendix K of this Draft EIR.</p>					

(i) 9th Street Elementary School

9th Street Elementary School is located at 835 Stanford Avenue, approximately 1 mile northwest of the Project Site, and offers instruction for grades K–5 on a single-track calendar. According to LAUSD, 9th Street Elementary School has a capacity of 375 students. During the 2017–2018 academic year, 9th Street Elementary School had a residential enrollment of 292 students and an actual enrollment of 347 students. Therefore, since the school's capacity of 375 students is more than the residential enrollment of 292 students, 9th Street Elementary School had an excess capacity of 83 seats and is not considered overcrowded under existing conditions.

LAUSD's five-year projection for 9th Street Elementary School indicates that the school is projected to have a resident enrollment of 353 students, resulting in an excess capacity of 22 seats. Therefore, 9th Street Elementary School is not projected to experience overcrowding in the future.

**Table IV.H.3-2
Capacity and Projected Enrollment (2022–2023) of LAUSD Schools that Serve the Project Site**

School Name	Capacity^a	Projected Resident Enrollment^b	Projected Seating Availability/ (Shortage)^c	Overcrowding Projected in Future^d
9th Street Elementary School	375	353	22	No
Hollenbeck Middle School	1,032	1,295	(263)	Yes
Boyle Heights Zone of Choice Schools ^e	2,883	3,328	(445)	Yes

^a School's operating capacity, or the maximum number of students the school can serve with the school's classroom utilization. Excludes capacity used by charter co-locations. Includes capacity for magnet program.

^b Projected five-year total number of students living in the school's attendance area and who are eligible to attend the school at the start of the school year. Includes magnet students.

^c Projected seating availability/shortage is projected capacity minus projected resident enrollment.

^d The school is projected to be overcrowded or without available capacity if any of these conditions exist: there will be a capacity shortage, or there will be available capacity of less than or equal to a margin of 20 seats.

^e Schools and programs that are part of a "school choice area" pull enrollments from the area school(s) that have resident attendance boundaries. Seating availability/shortage and overcrowding is calculated and reported for the school choice area as a whole.

Source: Letter from Rena Perez, Director of Master Planning & Demographics, LAUSD Facilities Services Division, dated July 25, 2018. See Appendix K of this Draft EIR.

(ii) Hollenbeck Middle School

Hollenbeck Middle School is located at 2510 East 6th Street, less than 1 mile northeast of the Project Site, and offers instruction for grades 6–8 on a single-track calendar. According to LAUSD, Hollenbeck Middle School has a capacity of 1,032 students. During the 2017–2018 academic year, Hollenbeck Middle School had a residential enrollment of 1,433 students and an actual enrollment of 1,017 students. Therefore, since the school's available capacity of 1,032 students is less than the residential enrollment of 1,433 students, Hollenbeck Middle School has a capacity shortage of 401 seats and is considered overcrowded under existing conditions.

LAUSD's five-year projection for Hollenbeck Middle School indicates that the school is projected to have an enrollment of 1,295 students, resulting in a capacity shortage of 263 seats. Therefore, Hollenbeck Middle School is projected to experience overcrowding in the future.

(iii) Boyle Heights 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.²¹ Zones of Choice are geographic areas that feature different high school options that offer college preparatory education and career preparation. The Boyle Heights Zone of Choice is located in the LAUSD's East Local District.

Students living in the Boyle Heights Zone of Choice area are allowed to apply for one of the Boyle Heights Zone of Choice high schools for grades 9–12, which include: Boyle Heights Science Technology Engineering Math (STEM) Academy, Theodore Roosevelt High School, and Felicitas & Gonzalo Mendez High School. Boyle Heights STEM Academy is located at 2550 E 6th Street, less than 1 mile northeast of the Project Site, Theodore Roosevelt High School is located at 456 S Mathews Street, approximately 1 mile northeast of the Project Site, and Felicitas & Gonzalo Mendez High School is located at 1200 Plaza Del Sol East, approximately 1 mile north of the Project Site.

According to LAUSD, Boyle Heights Zone of Choice high schools have an overall capacity of 2,883 students. During the 2017–2018 academic year, Boyle Heights Zone of Choice high schools had a total resident enrollment of 3,570 students and an actual enrollment of 2,568 students. Based on Boyle Heights Zone of Choice high schools' capacity of 2,883 students and its resident enrollment of 3,570 students, the high schools had a shortage of 687 seats during the 2017–2018 school year. Therefore, Boyle Heights Zone of Choice high schools are considered overcrowded under existing conditions.

LAUSD's five-year projection for Boyle Heights Zone of Choice high schools indicates that the high schools are projected to have a total enrollment of 3,328 students, resulting in a capacity shortage of 445 seats. Therefore, Boyle Heights Zone of Choice high schools are projected to experience overcrowding in the future.

(b) Open Enrollment Policy

The open enrollment policy is a state-mandated policy that enables students anywhere in the LAUSD to apply to any regular, grade-appropriate Los Angeles public school with designated open enrollment seats.²² Open enrollment transfers are issued on a space-available basis only. No student living in a particular school's attendance area will

²¹ LAUSD, *About Zones of Choice*, <http://achieve.lausd.net/zoc>, accessed March 12, 2020.

²² LAUSD, *K–12 Open Enrollment*, <http://achieve.lausd.net/K12OpenEnrollment>, accessed March 12, 2020.

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

LAUSD has over 277 independent and affiliated charter schools within its jurisdiction, serving over 138,000 students in grades kindergarten through 12th grade.²³ The charter schools in the vicinity of the Project Site include the Arts in Action Community Schools, Ánimo Jefferson Middle School, Ánimo Oscar De La Hoya Charter High School, Ánimo Ralph Bunche High School, Extera #2, Extera Public School, Jardin de la Infancia, KIPP Los Angeles College Preparatory, KIPP Promesa Prep, Metro Charter School, Para Los Ninos Charter Schools, Puente Charter School, SIA Tech Boyle Heights, and Synergy Kinetic Academy.²⁴ 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 all charter schools; as indicated above, capacity and/or enrollment information may not be reported for some independent charter schools.²⁵

(d) Magnet Schools

Currently, there are 312 magnet programs located within the LAUSD.²⁶ Magnet programs offered at the following schools within the vicinity of the Project Site include, but are not limited to, Hollenbeck Middle School (Law/Public Service; Science/Technology/Engineering/Math/Medicine), Theodore Roosevelt High School (Science/Technology/Math), Euclid Avenue Elementary School (Gifted/Science/Technology/Engineering/Arts/Math), and Stevenson Middle School (Communication Arts, Gifted).²⁷ Since enrollment is application-based for magnet schools, overcrowding is not determined for magnet schools.

²³ LAUSD, *K–12 Open Enrollment*, <http://achieve.lausd.net/K12OpenEnrollment>, accessed March 12, 2020.

²⁴ California Charter Schools Association (CCSA), www.ccsa.org/schools/, accessed March 12, 2020.

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

²⁶ LAUSD, *Unified Enrollment, Magnet Program*, <http://echoices.lausd.net/Magnet/>, accessed March 12, 2020.

²⁷ LAUSD, *Unified Enrollment, Magnet Schools/Centers*, <http://echoices.lausd.net/Magnet/AlphabeticalList>, accessed August 8, 2018.

(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.²⁸ 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 that now represents over 33,000 educators and health and human services professionals in the LAUSD, 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.^{29,30} During the 2018–2019 school year, there were 46 pilot schools located within the LAUSD.³¹

(f) Proposed New Public Schools

As discussed above, the primary funding sources for the LAUSD Facilities Services Division are local bonds and matching funds from State bonds. The Facilities Services Division is managing a \$25.6 billion program to build new schools to reduce overcrowding and modernize existing campuses throughout LAUSD's service area. To date, more than 600 new projects providing more than 170,000 new seats have been constructed, and more than 22,000 school modernization projects have completed construction to provide upgraded facilities.³² According to the LAUSD, no new school construction is planned in the vicinity of the Project Site.³³

(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 3 private schools, ranging from kindergarten through 12th grade, within 1 mile of the Project Site's street address.³⁴ This information is presented for factual

²⁸ LAUSD, *Pilot Schools, Frequently Asked Questions*, <https://achieve.lausd.net/Page/2830>, accessed March 12, 2020.

²⁹ LAUSD, *Pilot Schools, Overview*, <https://achieve.lausd.net/Page/2841>, accessed March 12, 2020.

³⁰ United Teachers Los Angeles, *Contact Us*, www.utla.net/contact-us, accessed March 12, 2020.

³¹ LAUSD, *Pilot Schools, 2018–2019 List of Pilot Schools*.

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

³³ Letter from Rena Perez, Director of Master Planning & Demographics, LAUSD Facilities Services Division, dated July 25, 2018. See Appendix K of this Draft EIR.

³⁴ Private School Review, *Private Schools within 1 miles [sic] of 2143 Violet Street*, www.privateschoolreview.com/schools-by-location/2143%20Violet%20St%2C%20Los%20Angeles%2C%20CA%2090021-original-address-2143%20Violet/34.032842/-118.2286750000001/1/None/0/0/None/None/0/elementary, accessed March 12, 2020.

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 governmental facilities (i.e., schools), need for new or physically altered governmental facilities (i.e., schools), the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools.

In assessing impacts related to schools in this section, the City will use Appendix G as the thresholds of significance. The factors identified below from the *Thresholds Guide* will be used where applicable and relevant to assist in analyzing the Appendix G thresholds. 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 the 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.³⁵

This analysis focuses on public schools that would serve the Project Site. This analysis does not take into account the LAUSD options that would allow students generated by the Project to enroll at other LAUSD schools located away from their home attendance area, or students who may enroll in private schools or participate in home schooling. In any case, students who opt to enroll within districts other than their home districts are required to obtain inter-district transfer permits to ensure that existing facilities of the incoming schools would not suffer impacts due to the additional enrollment. Furthermore, this analysis is conservative as it does not account for the fact that there are several public school options such as charter schools and magnet schools, and private school options in the Project Site vicinity that could also serve Project residents, nor does it account for the Project's future residents who may already reside in the school attendance boundaries and would move to the Project Site.³⁶

c. Project Design Features

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

d. Project Impacts

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

³⁵ Los Angeles Unified School District, 2018 Developer Fee Justification Study, March 2018.

³⁶ 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.

(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 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 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 development of live-work units. As noted above, the Project would retain a portion of existing live-work units and warehouse uses and develop new office uses, retail/restaurant uses, and artist production amenity space. Such non-residential components of the Project could generate students as employees of the non-residential uses may relocate to the Project Site vicinity. As shown in Table IV.H.3-3 on page IV.H.3-17, using the applicable LAUSD student generation rates for the Project's land uses, the Project would generate approximately 388 new students consisting of 211 elementary school students, 57 middle school students, and 120 high school students. As also shown in Table IV.H.3-3, the existing uses within the Project Site currently generate approximately 27 students consisting of 15 elementary school students, 4 middle school students, and 8 high school students. Thus, when accounting for the removal of the existing on-site uses, buildout of the Project would result in a net increase of 361 students consisting of 196 elementary school students, 53 middle school students, and 112 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:

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

Land Use	Units	Students Generated ^a			
		Elementary School (K–6) ^b	Middle School (6–8)	High School (9–12)	Total
Existing					
Live-Work Units	10 du	2	1	1	4
Office	6,983 sf	4	1	2	7
Retail	25,739 sf	9	2	5	16
Warehouse	2,109 sf	0	0	0	0
<i>Total Existing</i>		15	4	8	27
Proposed at Buildout					
Live-Work Units	353 du	80	22	46	148
Office	194,357 sf	114	31	65	210
Retail/Restaurant	47,597 sf	16	4	9	29
Warehouse	2,109 sf	0	0	0	0
Artist Production Amenity Space	926 sf	1	0	0	1
<i>Total Project Student Generation</i>		211	57	120	388
Project Net Student Generation		196	53	112	361
<hr/>					
<i>du = dwelling units</i>					
<i>sf = square feet</i>					
<i>Totals may not sum due to rounding.</i>					
^a Based on student generation factors provided in the 2018 LAUSD Developer Fee Justification Study, 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 non-residential uses, the following student generation rates were used: 0.001077 student per square foot for “Standard Commercial Office”; 0.000610 student per square foot for “Neighborhood Shopping Centers”; and 0.000304 student per square foot for “Industrial Parks”. The 2018 LAUSD Developer Fee Justification Study does not provide student generation factors for artist production uses. Therefore, the highest available rate for comparable land uses is applied (i.e., 0.001077 student per square foot for “Standard Commercial Office”). In addition, since the 2018 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).					
Source: Eyestone Environmental, 2020.					

- Open enrollment that enables students anywhere within the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated open enrollment seats;

- Magnet schools and magnet centers such as Hollenbeck Middle School (Law/Public Service; Science/Technology/Engineering/Math/Medicine), Theodore Roosevelt High School (Science/Technology/Math), Euclid Avenue Elementary School (Gifted/Science/Technology/Engineering/Arts/Math), and Stevenson Middle School (Communication Arts, Gifted), which are open to qualified students in the LAUSD;
- The Permits With Transportation Program, which allows students to continue to go to the schools within the same feeder pattern of the school they were enrolled in from elementary through high school.³⁷ The LAUSD provides transportation to all students enrolled in the Permits With Transportation Program regardless of where they live within the LAUSD;
- Intra-district parent employment-related transfer permits that allow students to enroll in a school that serves the attendance area where the student's parent is regularly employed if there is adequate capacity available at the school;
- Sibling permits that enable students to enroll in a school where a sibling is already enrolled; and
- Child care permits that allow students to enroll in a school that serves the attendance area where a younger sibling is cared for every day after school hours by a known child care agency, private organization, or a verifiable child care provider.

Based on capacity and existing enrollment data from LAUSD, 9th Street Elementary School, Hollenbeck Middle School, and Boyle Heights Zone of Choice high schools would not have adequate capacity to accommodate the new students generated by the Project under existing conditions. Specifically, with the addition of Project-generated students, the 9th Street Elementary School would have a seating shortage of 113 students (i.e., existing seating availability for 83 students minus the Project student generation of 196 students), Hollenbeck Middle School would have a seating shortage of 454 students (i.e., existing shortage of 401 students in addition to the Project student generation of 53 students), and Boyle Heights Zone of Choice high schools would have a seating shortage of 799 students (i.e., existing shortage of 687 students in addition to the Project student generation of 112 students).

In considering projected future enrollment 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 Project under projected future conditions. Specifically, 9th Street Elementary School would have a seating shortage of 174 students

³⁷ A feeder pattern is the linkage from elementary school, middle school, and high school.

(i.e., future seating availability for 22 students minus the Project student generation of 196 students), Hollenbeck Middle School would have a seating shortage of 316 students (i.e., future shortage of 263 students in addition to the Project student generation of 53 students), and Boyle Heights Zone of Choice high schools would have a seating shortage of 557 students (i.e., future shortage of 445 students in addition to the Project student generation of 112 students) under projected future conditions. However, 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.³⁸ In addition, no new school construction is currently planned.³⁹

Even if new schools were to be required, pursuant to SB 50, the Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of the Project's building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered full and complete mitigation of Project-related school impacts. Therefore, payment of the applicable development school fees to the LAUSD would offset the potential impact of additional student enrollment at schools serving the Project Site.

As such, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools.

(2) 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 would be less than significant.

³⁸ LAUSD, *Facilities Services Division, 2017 Facilities Services Division Strategic Execution Plan*.

³⁹ Letter from Rena Perez, Director of Master Planning & Demographics, LAUSD Facilities Services Division, dated July 25, 2018. See Appendix K of this Draft EIR.

e. Cumulative Impacts

(1) Impact Analysis

As identified in Section III, Environmental Setting, of this Draft EIR, there are 74 related projects located in the Project Site vicinity. Of Related Project Nos. 1 through 74, 71 were identified as being located within the attendance boundaries of 9th Street Elementary School, Hollenbeck Middle School, or Boyle Heights Zone of Choice high schools. Therefore, these 71 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 9th Street Elementary School, Hollenbeck Middle School, or Boyle Heights Zone of Choice high schools.

As shown in Table IV.H.3-4 on page IV.H.3-21, the 71 related projects located within the attendance boundaries of the same schools that would serve the Project could potentially generate a total of 10,262 students consisting of 5,602 9th Street Elementary School students, 1,661 Hollenbeck Middle School students, and 2,999 Boyle Heights Zone of Choice high school students, based on the rates provided in the 2018 LAUSD Developer Fee Justification Study. As indicated above, the Project would generate a net increase of approximately 361 new students consisting of 196 elementary school students, 53 middle school students, and 112 high school students. Therefore, the Project in combination with the 71 related projects would have the potential to generate a cumulative total of 10,620 students consisting of 5,798 9th Street Elementary School students, 1,714 Hollenbeck Middle School students, and 3,111 Boyle Heights Zone of Choice high school students.

Based on capacity and existing enrollment capacity data from LAUSD, the schools serving the Project and the 71 related projects would not have adequate seating capacity. Specifically, with the addition of students generated by the Project in combination with the 71 related projects, 9th Street Elementary School would have a seating shortage of 5,715 students (i.e., existing seating availability for 83 students minus the 5,796 students generated by the Project and related projects), Hollenbeck Middle School would have a seating shortage of 2,115 students (i.e., existing shortage of 401 students in addition to the 1,714 students generated by the Project and related projects), and Boyle Heights Zone of Choice high schools would have a seating shortage of 3,798 students (i.e., shortage of 687 students in addition to the 3,111 students generated by the Project and related projects).

In considering projected future enrollment 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 Project and related projects under projected future conditions. Specifically, 9th Street Elementary School would have a

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

No. ^a	Project Name/Address	Land Use ^b	Unit/Area	Students Generated ^{c,d}			Total
				9th Street Elementary (K–5)	Hollenbeck Middle School (6–8)	Boyle Heights Zone of Choice High Schools (9–12) ^e	
1	540 S. Santa Fe Ave.	Office	65,800 sf	39	10	22	71
2	601 S. Main St.	Apartment	452 du	103	—	—	103
		Retail	25,000 sf	8	—	—	8
4	534 S. Main St.	Apartment	160 du	36	10	—	46
		Retail	18,000 sf	6	2	—	8
		Restaurant	3,500 sf	1	0	—	1
		Fast-Food Restaurant	3,500 sf	1	0	—	1
6	1525 E. Industrial St.	Apartment	328 du	74	20	43	137
		Office	27,300 sf	16	4	9	29
		Retail	6,400 sf	2	1	1	4
		Restaurant	5,700 sf	2	1	1	4
7	950 E. 3rd St.	School ^f	532 stu	—	0	0	0
		Retail	30,100 sf	—	3	6	9
		Apartment	635 du	—	39	82	121
8	2051 E. 7th St.	Apartment	320 du	73	20	41	134
		Retail	15,000 sf	5	1	3	9
		Restaurant	5,000 sf	2	0	1	3
9	963 E. 4th St.	Office	79,000 sf	—	—	26	26
		Retail	25,000 sf	—	—	5	5
		Restaurant	20,000 sf	—	—	4	4

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. ^a	Project Name/Address	Land Use ^b	Unit/Area	Students Generated ^{c,d}			Total
				9th Street Elementary (K–5)	Hollenbeck Middle School (6–8)	Boyle Heights Zone of Choice High Schools (9–12) ^e	
10	826 S. Mateo St.	Condominium	90 du	20	5	12	37
		Retail	11,000 sf	4	1	2	7
		Restaurant	5,600 sf	2	0	1	3
11	2030 E. 7th St.	Office	243,600 sf	143	38	81	262
		Retail	40,000 sf	13	4	8	25
12	360 S. Alameda St.	Apartment	55 du	—	—	12	12
		Retail	2,500 sf	—	—	0	0
		Creative Office	6,300 sf	—	—	2	2
13	649 S. Wall St.	Assisted Living ^g	55 beds	—	—	—	0
		Office	55 emp	7	2	—	9
14	410 Center St.	Office	110,000 sf	0	0	37	37
15	500 S. Mateo St.	Restaurant	12,820 sf	4	1	2	7
16	400 S. Alameda St.	Hotel (66 rm)	42,900 sf	6	2	3	11
		Retail	840 sf	0	0	0	0
		Restaurant	2,130 sf	1	0	0	1
17	719 E. 5th St.	Apartment	160 du	36	10	—	46
		Retail	7,500 sf	2	1	—	3
18	2130 E. Violet St.	Office	94,000 sf	55	15	31	101
		Retail	7,450 sf	2	1	1	4
19	929 E. 2nd St.	Mixed Use Private Club	48,900 sf	—	—	9	9
20	1800 E. 7th St.	Apartment	122 du	28	7	16	51
		Office	13,600 sf	8	2	5	15

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. ^a	Project Name/Address	Land Use ^b	Unit/Area	Students Generated ^{c,d}			Total
				9th Street Elementary (K–5)	Hollenbeck Middle School (6–8)	Boyle Heights Zone of Choice High Schools (9–12) ^e	
22	454 E. Commercial St.	Bus Facility ^h	2 ac	—	—	0	0
23	118 S. Astronaut E.S. Onizuka St.	Apartment	77 du	17	5	—	22
24	555 S. Mateo St.	Retail	153,000 sf	51	14	29	94
25	1000 S. Santa Fe. Ave.	Private Club	59,000 sf	20	5	11	36
		Guest Rooms (48 rm)	31,200 sf	4	1	2	7
26	2110 Bay St.	Apartment	110 du	25	7	14	46
		Office	113,000 sf	66	18	38	122
		Retail	43,700 sf	14	4	8	26
27	330 S. Alameda St.	Apartment	186 du	—	—	24	24
		Commercial	22,000 sf	—	—	4	4
28	668 S. Alameda St.	Apartment	475 du	108	29	62	199
		Commercial	84,000 sf	28	7	16	51
29	520 Mateo St.	Live/Work	475 units	108	29	62	199
		Office	105,000 sf	61	17	35	113
		Retail	10,000 sf	3	1	2	6
		Restaurant	10,000 sf	3	1	2	6
30	717 Maple Ave.	Apartment	452 du	103	—	—	103
		Retail	14,000 sf	5	—	—	5
31	433 S. Main St.	Condominium	191 du	43	—	—	43
		Retail	5,300 sf	2	—	—	2
		Coffee Shop	900 sf	0	—	—	0
32	676 Mateo St.	Apartment	185 du	42	11	24	77
		Commercial	27,000 sf	9	2	5	16

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. ^a	Project Name/Address	Land Use ^b	Unit/Area	Students Generated ^{c,d}			Total
				9th Street Elementary (K–5)	Hollenbeck Middle School (6–8)	Boyle Heights Zone of Choice High Schools (9–12) ^e	
33	732 Wall St.	Apartment	323 du	73	—	—	73
		Office	53,200 sf	31	—	—	31
		Retail	4,400 sf	1	—	—	1
		Wholesale/Storage	63,600 sf	0	—	—	0
		Restaurant	4,420 sf	1	—	—	1
		Event Space	9,200 sf	5	—	—	5
34	333 S. Alameda St.	Apartment	994 du	226	61	—	287
		Retail	993,000 sf	329	89	—	418
35	1129 E. 5th St.	Retail	27,000 sf	9	—	—	9
		Restaurant	31,700 sf	11	—	—	11
		Hotel (113 rm)	73,450 sf	10	—	—	10
		Apartment	129 du	29	—	—	29
		Art School	3,430 sf	2	—	—	2
		Art Space	10,340 sf	6	—	—	6
36	2650 E. Olympic Blvd.	Apartment	1,000 du	—	61	130	191
		Restaurant	46,000 sf	—	4	9	13
		Office	230,000 sf	—	36	77	113

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. ^a	Project Name/Address	Land Use ^b	Unit/Area	Students Generated ^{c,d}			Total
				9th Street Elementary (K–5)	Hollenbeck Middle School (6–8)	Boyle Heights Zone of Choice High Schools (9–12) ^e	
37	670 Mesquit St.	Hotel (236 rm)	153,400 sf	21	6	12	39
		Apartment	308 du	70	19	40	129
		Retail	79,200 sf	26	7	15	48
		Restaurant	89,600 sf	30	8	17	55
		Event Space	93,600 sf	31	8	18	57
		Gym	62,200 sf	21	6	12	39
		Grocery/Food Hall	56,900 sf	19	5	11	35
		Office	944,100 sf	552	149	316	1017
38	237 S. Los Angeles St.	Sports Complex	43,000 sf	14	4	—	18
39	640 S. Santa Fe Ave.	Office	91,200 sf	53	14	30	97
		Retail	9,400 sf	3	1	2	6
		Restaurant	6,600 sf	2	1	1	4
40	1745 E. 7th St.	Apartment	57 du	13	3	7	23
		Commercial	6,000 sf	2	1	1	4
41	940 E. 4th St.	Apartment	93 du	21	6	12	39
		Office	6,000 sf	4	1	2	7
		Retail	12,300 sf	4	1	2	7
42	609 E. 5th St.	Apartment	151 du	34	9	—	43
43	713 E. 5th St.	Apartment	51 du	12	3	—	15
44	1000 S. Mateo St.	Apartment	113 du	26	7	15	48
		Commercial	134,000 sf	44	12	25	81

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. ^a	Project Name/Address	Land Use ^b	Unit/Area	Students Generated ^{c,d}			Total
				9th Street Elementary (K–5)	Hollenbeck Middle School (6–8)	Boyle Heights Zone of Choice High Schools (9–12) ^e	
45	2159 E. Bay St.	Creative Office	202,954 sf	119	32	68	219
		Retail/Restaurant	16,000 sf	5	1	3	9
		Event/Meeting Space	3,235 sf	2	1	1	4
46	401 S. Hewitt St.	Office	255,500 sf	150	40	85	275
		Retail	4,970 sf	2	0	1	3
47	552 S. San Pedro St.	Affordable Housing	407 du	92	25	—	117
		Retail	12,300 sf	4	1	—	5
48	1005 S. Mateo St.	Industrial Park	94,800 sf	41	11	23	75
49	1800 E. 1st St.	Apartment	65 du	0	4	8	12
		Retail	5,000 sf	0	0	1	1
50	755 S. Los Angeles St.	Retail	16,700 sf	6	—	—	6
		Office	60,200 sf	35	—	—	35
		Restaurant	27,000 sf	9	—	—	9
51	601 S. Central Ave.	Apartment	236 du	54	14	—	68
		Retail	12,000 sf	4	1	—	5
52	527 Colyton St.	Condominium	310 du	70	19	40	129
		Retail	11,400 sf	4	1	2	7
		Production Space	11,700 sf	7	2	4	13
53	1100 E. 5th St.	Apartment (Live/Work)	220 du	50	13	29	92
		Commercial	49,000 sf	16	4	9	29
54	600 S. San Pedro St.	Apartment	303 du	69	19	—	88
		Retail	20,000 sf	7	2	—	9

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. ^a	Project Name/Address	Land Use ^b	Unit/Area	Students Generated ^{c,d}			Total
				9th Street Elementary (K–5)	Hollenbeck Middle School (6–8)	Boyle Heights Zone of Choice High Schools (9–12) ^e	
55	655 S. San Pedro St.	Apartment	81 du	18	5	—	23
56	656 S. Stanford Ave.	Apartment	82 du	19	5	—	24
57	641 Imperial St.	Residential	140 du	32	9	18	59
		Office	14,700 sf	9	2	5	16
58	2901 E. Olympic Blvd.	Apartment	4,400 du	—	269	570	839
		Retail	185,000 sf	—	17	35	52
		Office	125,000 sf	—	20	42	62
		Medical Office	25,000 sf	—	4	7	11
		Daycare	15,000 sf	—	1	3	4
		Library	15,000 sf	—	1	3	4
59	2407 E. 1st St.	Apartment	50 du	—	3	6	9
		Office	8,500 sf	—	1	3	4
		Retail	3,400 sf	—	0	1	1
60	810 E. 3rd St.	Apartment	4 du	—	—	1	1
		Restaurant	3,500 sf	—	—	1	1
		Retail	6,200 sf	—	—	1	1
61	1206 E. 6th St.	Apartment	1,305 du	296	80	169	545
		Condominium	431 du	98	26	56	180
		Hotel (510 rm)	331,500 sf	46	12	26	84
		Office	253,514 sf	148	40	85	273
		School ^f	29,316 sf	0	0	0	0
		Commercial	127,609 sf	42	11	24	77
		Live Theater ^l	400 seats	N/A	N/A	N/A	0

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. ^a	Project Name/Address	Land Use ^b	Unit/Area	Students Generated ^{c,d}			Total
				9th Street Elementary (K–5)	Hollenbeck Middle School (6–8)	Boyle Heights Zone of Choice High Schools (9–12) ^e	
62	554 S. San Pedro St.	Apartment	303 du	69	19	—	88
		Commercial	19,900 sf	7	2	—	9
63	443 S. Soto St.	School ^f	625 stu	0	0	0	0
64	1024 S. Mateo St.	Apartment	104 du	24	6	13	43
		Office	102,000 sf	60	16	34	110
		Restaurant	16,300 sf	5	1	3	9
		Retail	5,830 sf	2	1	1	4
		Industrial	5,500 sf	2	1	1	4
65	755 S. Wall St.	Office	53,200 sf	31	—	—	31
		Apartment	323 du	73	—	—	73
		Retail	4,400 sf	1	—	—	1
66	508 E. 4th St.	Apartment	41 du	9	3	—	12
67	2001 E. Washington Blvd.	Industrial	187,000 sf	—	—	46	46
68	300 S. Main St.	Apartment	471 du	107	29	—	136
		Retail	5,190 sf	2	0	—	2
		Restaurant	27,800 sf	9	2	—	11
69	100 S. Boyle Ave.	Affordable Housing	44 du	—	3	6	9
		Retail	8,000 sf	—	1	2	3
70	2053 E. 7th St.	Hotel	53,400 sf	7	2	4	13
71	401 E. 7th St.	Affordable Housing	99 du	22	6	—	28
72	443 S. Soto St.	Elementary School ^f	625 stu	0	0	0	0

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. ^a	Project Name/Address	Land Use ^b	Unit/Area	Students Generated ^{c,d}			Total
				9th Street Elementary (K–5)	Hollenbeck Middle School (6–8)	Boyle Heights Zone of Choice High Schools (9–12) ^e	
73	777 S. Alameda St.	Restaurant	117,375 sf	39	—	—	39
		Retail	66,155 sf	22	—	—	22
		Office	850,444 sf	498	—	—	498
		Hotel (125 rm)	81,250 sf	11	—	—	11
74	2124-2132 E. 7th Place ^l	Retail/Warehouse-Restaurant conversion	5,055 sf	2	—	1	3
Related Projects Student Generation				5,602	1,661	2,999	10,262
Net Project Student Generation				196	53	112	361
Total Student Generation for Related Projects and Project				5,798	1,714	3,111	10,623
<p>ac = acres du = dwelling units emp = employees rm = rooms sf = square feet stu = students N/A = No generation rate available. — = Related project is not located within the attendance boundary of that school; therefore, student generation was not calculated. Related Project Nos. 3, 5, and 21 are not located within the attendance boundaries of at least one of the schools servicing the Project Site (i.e., 9th Street Elementary School, Hollenbeck Middle School, and Boyle Heights Zone of Choice High Schools) and not included in this analysis of cumulative impacts to schools.</p>							

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. ^a	Project Name/Address	Land Use ^b	Unit/Area	Students Generated ^{c,d}			Total
				9th Street Elementary (K–5)	Hollenbeck Middle School (6–8)	Boyle Heights Zone of Choice High Schools (9–12) ^e	
Totals may not sum due to rounding.							
^a Project No. corresponds to Table III-1, List of Related Projects, and Figure III-1, in Section III, Environmental Setting, of this Draft EIR.							
^b For hotel uses, a square footage rate of 650 square feet per room is applied. Source: deRoos, J. A. (2011). Planning and programming a hotel [Electronic version].							
^c Based on student generation factors provided in the 2018 LAUSD Developer Fee Justification Study, 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 non-residential uses, the following student generation rates were used: 0.001077 student per square foot for Standard Commercial Office; 0.000610 student per square foot for Neighborhood Shopping Centers; 0.000254 student per square foot for Lodging uses; 0.000792 student per square foot for Industrial Business Parks; 0.000013 student per square foot for Storage uses; and 0.2249 student per employee for commercial uses. In addition, as 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).							
^d The 2018 LAUSD Developer Fee Justification Study does not provide student generation factors for restaurant, coffee shop, grocery, food hall, day care, library, gym, and private club land uses. Therefore, the highest available rate for comparable land uses is applied (i.e., 0.610 student per 1,000 square feet for “Neighborhood Shopping Centers”). The 2018 LAUSD Developer Fee Justification Study does not provide student generation factors for event/meeting space, art school/space, production space, and other land uses. Therefore, the highest available rate for comparable land uses is applied (i.e., 1.077 students per 1,000 square feet for “Standard Commercial Office”).							
^e Boyle Heights Zone of Choice High Schools include: Boyle Heights Science Tech Engineering Math High School, Theodore Roosevelt Senior High School, and Felicitas and Gonzalo Mendez Senior High School.							
^f This related project provides its own school uses that generate students and is not expected to generate students at the identified schools within the Project’s vicinity.							
^g This type of use is not expected to generate K–12 students.							
^h This project is an expansion of existing Los Angeles Department of Transportation bus maintenance and inspection facilities. Therefore, the student generation population is not expected to increase.							
ⁱ This related project provides units per seats for theater uses. The LAUSD 2018 Developer Fee Justification Study does not provide student							

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. ^a	Project Name/Address	Land Use ^b	Unit/Area	Students Generated ^{c,d}			Total
				9th Street Elementary (K–5)	Hollenbeck Middle School (6–8)	Boyle Heights Zone of Choice High Schools (9–12) ^e	
<i>generation rates per units of seats for such uses.</i>							
<i>^j This project is located on the Project Site but is not considered part of the Project because both the building permit and certificate of occupancy were granted but the project was not occupied at the time of issuance of the NOP.</i>							
<i>Source: Eyestone Environmental, 2020.</i>							

seating shortage of 5,776 students (i.e., future seating availability for 22 students minus the 5,798 students generated by the Project and related projects), Hollenbeck Middle School would have a seating shortage of 1,977 students (i.e., existing shortage of 263 students in addition to the 1,714 students generated by the Project and related projects), and Boyle Heights Zone of Choice high schools would have a seating shortage of 3,556 students (i.e., shortage of 445 students in addition to the 3,111 students generated by the Project and related projects).

As demonstrated above, when compared to both existing enrollment and project enrollment data, the students generated by the Project in combination with the 71 related projects located within the school attendance boundaries would cause seating shortages at 9th Street Elementary School, Hollenbeck Middle School, and Boyle Heights 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 very small percentage (i.e., approximately 3.4 percent) of the total estimated cumulative growth in students. LAUSD may consider presenting a local bond measure to voters in the near future to raise capital for facility modernization and new construction.⁴⁰ However, no new school construction is currently planned.⁴¹ Furthermore, as with the Project, future development, including the related projects, would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits pursuant to SB 50. Pursuant to Government Code Section 65995, the payment of these fees would be considered full and complete mitigation of school impacts generated by the related projects. **Therefore, cumulative impacts are less than significant.**

(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 would be less than significant.

⁴⁰ LAUSD, *Facilities Services Division, 2017 Facilities Services Division Strategic Execution Plan*.

⁴¹ Letter from Rena Perez, Director of Master Planning & Demographics, LAUSD Facilities Services Division, dated July 25, 2018. See Appendix K of this Draft EIR.