IV. Environmental Impact Analysis
I.3 Public Services—Schools

1. Introduction

This section of the Draft EIR provides an analysis of the Project's potential impacts on public school facilities that serve the Project Site. This section evaluates the existing conditions of school facilities in the vicinity, whether the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered public school facilities, and the effect of mandatory regulatory compliance regarding development impact fees for schools. The analysis is based in part of information provided by Los Angeles Unified School District (LAUSD), in a letter dated August 22, 2018, which is included in Appendix I.3 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, the Kindergarten–University Public Education Facilities Bond Act of 1998, 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, the payment of these fees by a developer serves to fully mitigate all potential project impacts on public school facilities from implementation of a project 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 school district according to average daily attendance rates.

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[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/feecalc.nsf/3950786566dd7fcc88258152007def26?OpenForm, accessed November 5, 2019.*

(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 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.

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.[3] 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.[4] The LAUSD is divided into six local districts.[5] The Project Site is located in the Central Local District, as shown in Figure IV.I.3-1 on page IV.I.3-4.

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[3] *LAUSD, Fingertip Facts 2018–2019.*

[4] *LAUSD, Fingertip Facts 2018–2019.*

[5] *LAUSD, Local District Map, http://achieve.lausd.net/domain/34, accessed November 5, 2019.*

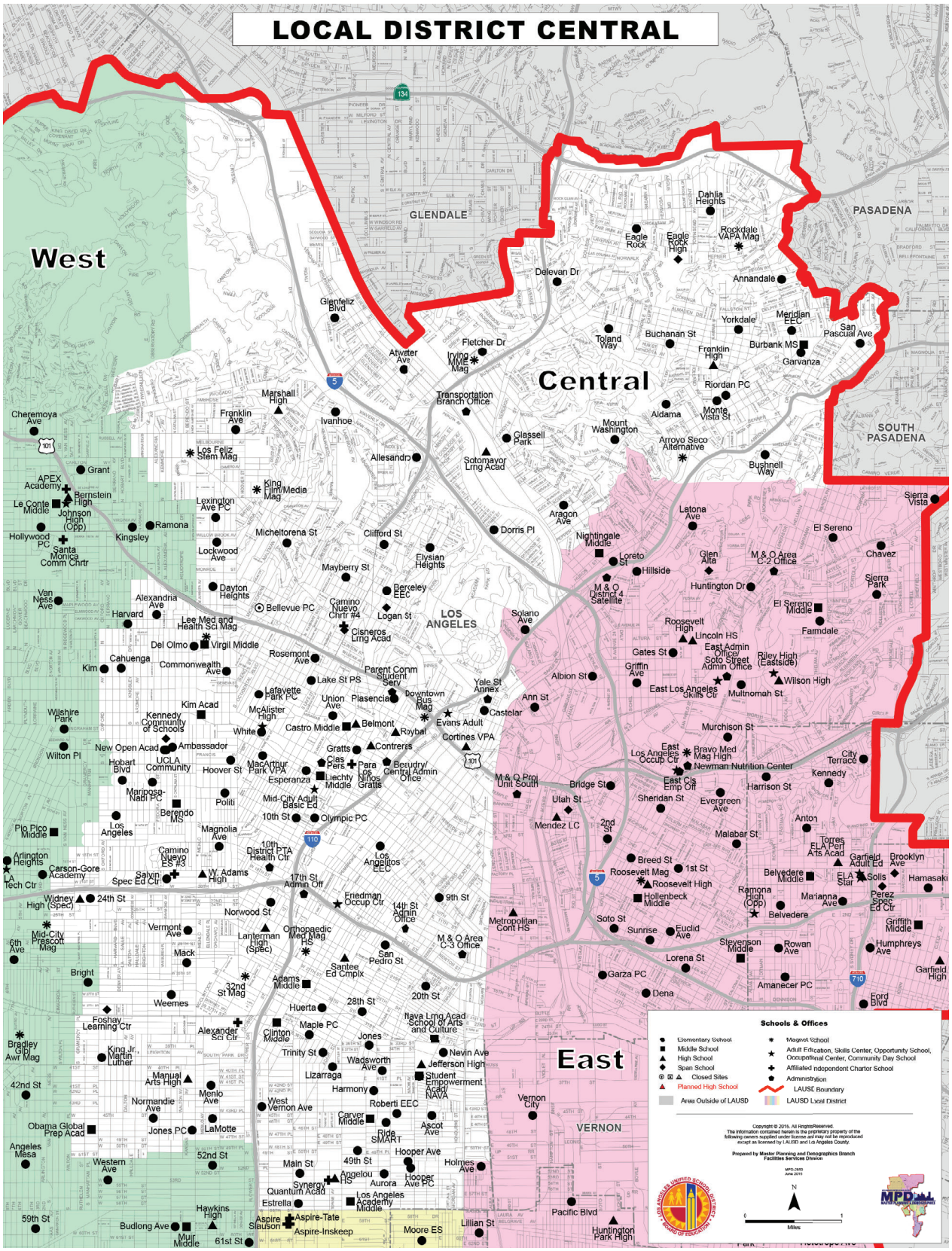

Figure IV.I.3-1
Los Angeles Unified School District,
Central Local District Boundary Map

Source: LAUSD, Master Planning and Demographics Branch Facilities Services Division, June 2015.

As discussed above, California Senate Bill 50 provides funding for the construction of new school facilities. Other major statewide funding sources for school facilities include Proposition 47 and 55. Proposition 47 is a $13.2 billion bond approved in November 2002 and provides $11.4 billion for K–12 public school facilities. Proposition 55 is a $12.3 billion bond approved in March 2004 and provides $10 billion to address overcrowding and accommodate future growth in K–12 public schools. The LAUSD's voter-approved Bond Program is currently valued at $27.5 billion. Using these funding sources, LAUSD has implemented the New School Construction Program, a multi-year capital improvement program. The goals of the New School Construction Program are to: eliminate involuntary busing of students out of their home attendance areas, operate all schools on a traditional two-semester calendar, and implement full-day kindergarten throughout LAUSD. Through the New School Construction Program, LAUSD has delivered over 170,000 new classroom seats, completed over 22,000 repair and modernization projects, and achieved its primary goal of reducing overcrowding by transitioning schools to the traditional two-semester calendar. The next phase of improvements will focus on modernizing older schools by addressing critical repairs, safety issues, resource conservation, and technology upgrades through the School Upgrade Program.[6]

(a) Public Schools Serving the Project Site

As shown in Figure IV.I.3-2 on page IV.I.3-6, the public schools that serve students in the vicinity of the Project Site include 9th Street Elementary, Liechty Middle School, and high schools in the Belmont Zone of Choice.[7] These schools currently operate under a single-track calendar in which instruction generally begins in mid-August and continues through early June. Table IV.I.3-1 on page IV.I.3-7 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.[8]

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[6] *LAUSD Facilities Services Division, Facilities Services Division 2019 Strategic Execution Plan.*

[7] *Belmont Zone of Choice high schools include: Miguel Contreras Learning Complex—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.*

[8] *Letter from Rena Perez, Director of Master Planning and Demographics, LAUSD Facilities Services Division, dated August 22, 2018. See Appendix I.3 of this Draft EIR.*

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

Source: Apple Maps, 2019; Eyestone Environmental, 2019.

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

School Name	Current Capacity[a]	Resident Enrollment[b]	Actual Enrollment[c]	Current Seating Overage/ (Shortage)[d]	Overcrowded Now?[e]
9th Street Elementary School	375	292	347	83	**No**
Liechty Middle School	1,191	1,674	983	(483)	**Yes**
Belmont Zone of Choice High Schools[f]	6,594	6,925	4,967	(331)	**Yes**

[a] *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.*

[b] *Total number of students living in the school's attendance area, who are eligible to attend the school. Includes magnet students.*

[c] *Number of students actually attending the school currently, including magnet students.*

[d] *Seating overage or (shortage) based on capacity minus resident enrollment.*

[e] *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.*

[f] *Belmont Zone of Choice high schools include: Miguel Contreras Learning Complex—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 August 22, 2018. See Appendix I.3 of this Draft EIR.

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. LAUSD uses resident enrollment, rather than actual enrollment, to determine whether schools are below or above capacity.[9]

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

[9] *Letter from Rena Perez, Director of Master Planning and Demographics, LAUSD Facilities Services Division, dated August 22, 2018. See Appendix I.3 of this Draft EIR.*

seating shortage; or (2) there is currently a seating overage of less than or equal to 20 seats.[10]

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

Existing and project future enrollment levels at the schools serving the Project Site are further discussed below.

(i) 9th Street Elementary

9th Street Elementary is located at 835 Stanford Avenue, approximately 1.5 miles south of the Project Site, and offers instruction for Grades K–5 on a single-track calendar. As summarized in Table IV.I.3-1 on page IV.I.3-7, during the 2017–2018 academic year, 9th Street Elementary had a total capacity for 375 students, a residential enrollment of 292 students, and an actual enrollment of 347 students, resulting in an excess of 83 seats. 9th Street Elementary is not considered overcrowded under existing conditions.

As shown in Table IV.I.3-2, five-year projections by the LAUSD for 9th Street Elementary indicate that the school would have a projected enrollment of 353 students and an excess of 22 seats. Therefore, 9th Street Elementary would not be considered overcrowded under future conditions.

(ii) Liechty Middle School

Liechty Middle School is located at 650 South Union Avenue, approximately 1.5 miles northwest of the Project Site, and offers instruction for Grades 6–8 on a single-track calendar. As shown in Table IV.I.3-1, during the 2017–2018 academic year, Liechty Middle School had a total capacity for 1,191 students, a residential enrollment of 1,674 students, and an actual enrollment of 983 students, resulting in a shortage of 483 seats. Therefore, Liechty Middle School is considered overcrowded under existing conditions.

As shown in Table IV.I.3-2, five-year projections by the LAUSD for Liechty Middle School indicate that the school is projected to have a residential enrollment of

[10] *Letter from Rena Perez, Director of Master Planning and Demographics, LAUSD Facilities Services Division, dated August 22, 2018. See Appendix I.3 of this Draft EIR.*

Table IV.I.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]
9th Street Elementary	353	22	**No**
Liechty Middle School	1,762	(571)	**Yes**
Belmont Zone of Choice High Schools[d]	6,641	(47)	**Yes**

[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.*

[b] *According to the LAUSD, projected seating overage/(shortage) is projected capacity minus projected resident enrollment.*

[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.*

[d] *Belmont Zone of Choice high schools include: Miguel Contreras Learning Complex—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 August 22, 2018. See Appendix I.3 of this Draft EIR.

1,762 students, resulting in a shortage of 571 seats. Therefore, Liechty 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.

As discussed above, 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: Miguel Contreras Learning Complex—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

[11] *LAUSD, About Zones of Choice, https://achieve.lausd.net/Page/1888, accessed November 5, 2019.*

High, Edward R. Roybal Learning Center, and Miguel Contreras Learning Complex—Los Angeles School of Global Studies.

As shown in Table IV.I.3-1 on page IV.I.3-7, 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. Therefore, since the schools' available capacity of 6,594 students is less than the residential enrollment of 6,925 students (a shortage of 331 seats), Belmont Zone of Choice high schools are collectively considered overcrowded under existing conditions.

As summarized in Table IV.I.3-2 on page IV.I.3-9, 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 (although the level of such future overcrowding is projected to be substantially less than the existing level of overcrowding).

(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

[12] *LAUSD, K–12 Open Enrollment: Fact Sheet, http://achieve.lausd.net/Page/10999, accessed November 5, 2019.*

[13] *LAUSD Charter Schools Division, About Charter Schools, http://achieve.lausd.net/Page/1816, accessed November 5, 2019.*

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: USC East College Prep, USC Brio College Prep, Camino Nuevo High School Miramar, Para Los Niños–Evelyn Gratts Primary Center.[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]

(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 312 magnet programs located within the LAUSD.[17] Schools in the vicinity of the Project Site that offer magnet programs include the Edward R Roybal Learning Center Innovative Cinematic and Music Production Magnet and the Downtown Magnets High 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

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[14] *LAUSD Charter Schools Division, About Charter Schools, http://achieve.lausd.net/Page/1816, accessed November 5, 2019.*

[15] *California Charter Schools Association, Find a Charter School, www.ccsa.org/schools/, accessed November 5, 2019.*

[16] *Letter from Rena Perez, Director of Master Planning and Demographics, LAUSD Facilities Services Division, dated August 22, 2018. See Appendix I.3 of this Draft EIR.*

[17] *LAUSD, Choices 2020–2021, Magnet Programs.*

[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 5, 2019.*

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 44 pilot schools located within the LAUSD.[22]

(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] However, according to LAUSD, no new school construction is planned in the Project vicinity at this time.[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 four 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.

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[20] *LAUSD, Office of School Design Options, Pilot, Overview, https://achieve.lausd.net/Page/2841, accessed November 5, 2019.*

[21] *LAUSD, Office of School Design Options, Pilot, Overview, https://achieve.lausd.net/Page/2841, accessed November 5, 2019.*

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

[23] *LAUSD, Facilities Services Division, FSD Bond Program, http://laschools.org/new-site/, accessed November 5, 2019.*

[24] *LAUSD, Facilities Services Division, FSD Bond Program, http://laschools.org/new-site/, accessed November 5, 2019.*

[25] *Letter from Rena Perez, Director of Master Planning and Demographics, LAUSD Facilities Services Division, dated August 22, 2018. See Appendix I.3 of this Draft EIR.*

[26] *Private School Review, Schools Within One Mile of the Project Site, www.privateschoolreview.com, accessed November 5, 2019. Praada Academy is located approximately 0.4 mile from the Project Site; however, this listing appears to be a P.O. Box address for a school located elsewhere.*

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 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 school impacts on a case-by-case basis:

- 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

Construction- and operation-related impacts on schools were qualitatively and quantitatively (respectively) analyzed to assess whether development of the Project would result in substantial adverse physical impacts associated with the provision of new or

physically altered public school facilities the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios or other performance objectives. The anticipated number of students that would be generated by the Project was calculated by applying the student generation rates from the 2020 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 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 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

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

(1) Impact Analysis

(a) Construction

The Project would generate temporary part-time and full-time jobs associated with construction of the Project between the start of construction and Project buildout.

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[27] *LAUSD, 2020 Developer Fee Justification Study, March 2020.*

[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.*

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. The construction employment generated by the Project would not result in a material increase in the resident population on the Project Site or a corresponding increase in student generation from the Project during construction. In other words, construction of the Project would not increase the demand for schools in the vicinity of the Project Site. **Therefore, 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 or other performance objectives for schools and construction-related impacts would be less than significant.**

(b) Operation

As discussed in Section II, Project Description, of this Draft EIR, the Project includes: 180 residential for-sale condominium units; 252 residential apartments; two hotels with a combined total of 515 guest rooms, restaurants, ballrooms, meeting rooms, and amenities (fitness/spa); and 72,091 square feet of general commercial (retail/restaurant) uses.

As shown in Table IV.I.3-3 on page IV.I.3-16, using the applicable LAUSD student generation rates for proposed land uses, the Project could generate up to 363 new students, consisting of 196 elementary school students (Grades K–5), 54 middle school students (Grades 6–8), and 113 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.I.3-3
Estimated Number of Students Generated by the Project

Land Use	Units	Students Generated[a]			
		9th Street Elementary (K–5)	Liechty Middle School (6–8)	Belmont Zone of Choice High Schools (9–12)[b]	Total
Residential—Condominiums	180 du	41	11	24	76
Residential—Apartments	252 du	58	16	33	107
Hotel	457,947 sf[c] (515 rm)	67	18	38	123
Restaurant	12,170 sf	5	2	3	10
Commercial/Retail/Restaurant	72,091 sf	25	7	15	47
Project Student Generation		**196**	**54**	**113**	**363**

du = dwelling units

rm = rooms

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

[a] *Based on student generation factors provided in the LAUSD 2020 Developer Fee Justification Study, Tables 3 and 15, March 2020. For the residential component, the following student generation rates from Table 3 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 in Table 15 of 0.266 student per 1,000 square feet for "Lodging" is applied. For the Project's commercial uses, the student generation rate in Table 15 of 0.638 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: Miguel Contreras Learning Complex—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.*

[c] *457,947 is the total square footage of the hotel (470,117 sf) minus the hotel restaurant square footage (12,170 sf)*

Source: Eyestone Environmental, 2020.

- Magnet schools and centers (such as the Innovative Cinematic and Music Production Magnet and the Downtown Magnets High School), 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.[29] The LAUSD provides transportation to all students enrolled in the Permits With Transportation Program regardless of where they live within the LAUSD;

- Intra-district parent employment-related transfer permits that allow students to enroll in a school that serves the attendance area where the student's parent is regularly employed if there is adequate capacity available at the school;

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

- Child care permits that allow students to enroll in a school that serves the attendance area where a younger sibling is cared for every day after school hours by a known child care agency, private organization, or a verifiable child care provider.

Based on existing enrollment and capacity data from LAUSD, 9th Street Elementary has adequate capacity in the current and projected conditions, while both the Liechty Middle School, and the Belmont Zone of Choice high schools are considered over crowded in the current and projected conditions.

More specifically, in the existing conditions, at 9th Street Elementary School, there would be a shortage of 113 seats (i.e., the existing excess capacity of 83 seats minus the Project-generated 196 students). Liechty Middle School would have a shortage of 537 seats (i.e., the existing shortage of 483 seats plus the Project-generated 54 students), and the Belmont Zone of Choice high schools would have a shortage of 444 seats (i.e., the existing shortage of 331 seats plus the Project-generated 113 students).

In considering projected future capacity data from LAUSD, the Project-serving schools would not have adequate capacity to accommodate the new students generated by the Project under projected future conditions. At 9th Street Elementary School, there would be a shortage of 174 seats (i.e., the future excess capacity of 22 seats minus the Project-generated 196 students). Liechty Middle School would have a shortage of 625 seats (i.e., the future shortage of 571 seats plus the Project-generated 54 students). Belmont Zone of Choice high schools would have a shortage of 160 seats (i.e., the future shortage of 47 seats plus the Project-generated 113 students) under projected future conditions.

LAUSD is responsible for building new schools and modernizing existing schools to accommodate existing and projected demand. As stated in the 2019 Facilities Services Division Strategic Execution Plan, its mission is to provide safe and healthy learning

[29] *A feeder pattern is the linkage from elementary school, middle school, and high school.*

environments that support educational achievement throughout LAUSD.[30] To that end, LAUSD is committed to its New School Construction Program, which was developed to relieve overcrowding and address facilities needs through the construction of new classrooms; and similarly its Repair and Modernization Program, which improves deteriorating, aging and outdated conditions on school campuses. These programs, and LAUSD's activities generally, occur regardless of the Project.

In addition, LAUSD may consider presenting a local bond measure to voters to raise capital for facility modernization and new construction.[31] Furthermore, LAUSD's correspondence back to the City regarding the Project stated that no new school construction is currently planned as a result of the Project.[32] In addition, it is important to note that pursuant to Senate Bill 50, the Project Applicant would be required to pay development impact fees for schools to LAUSD prior to the issuance of the Project's building permit. Pursuant to Government Code Section 65995, the payment of these fees is full and complete mitigation of any potential impact on school facilities. Section 65995 also provides that a state or local agency may not deny or refuse to approve a legislative or adjudicative act, or both, involving the planning, use, or development of real property on the basis that school facilities are inadequate. In other words, regulatory compliance and the payment of development impact fees for schools constitutes the exclusive means of both considering and mitigating school facilities impacts of a project as a matter of law.

Therefore, payment of the applicable development impact school fees to the LAUSD would offset the potential impact of additional student enrollment at schools serving the Project Site.

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.

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[30] *LAUSD, Facilities Services Division, 2019 Facilities Services Division Strategic Execution Plan.*

[31] *LAUSD, Facilities Services Division, 2019 Facilities Services Division Strategic Execution Plan.*

[32] *Letter from Rena Perez, Director of Master Planning and Demographics, LAUSD Facilities Services Division, dated August 22, 2018. See Appendix I.3 of this Draft EIR.*

(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.

e. Cumulative Impacts

(1) Impact Analysis

As identified in Section III, Environmental Setting, of this Draft EIR, there are 50 related projects located in the vicinity of the Project Site. All 50 related projects were identified as being located within the attendance boundaries of 9th Street Elementary School, Liechty Middle School, and/or Belmont Zone of Choice high schools. These 50 related projects have the potential to combine with the Project and cumulatively generate new students who would attend the aforementioned schools. Therefore, these 50 related projects are considered in this cumulative analysis.

As shown in Table IV.I.3-4 on page IV.I.3-20, the 50 related projects located within the school attendance boundaries could potentially generate a total of 7,421 new students, consisting of 3,136 9th Street Elementary School students, 863 Liechty Middle School students, and 3,422 Belmont Zone of Choice high school students based on the student generation rates provided in the 2020 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 proposed Project boundary (i.e., all related projects do not fall within the boundaries of all of the schools as does the proposed Project). As indicated above, the Project could generate up to a total of 363 new students, consisting of 196 9th Street Elementary School students, 54 Liechty Middle School students, and 113 Belmont Zone of Choice high school students. Therefore, the Project in combination with the 50 applicable related projects would have the potential to generate a cumulative total of 7,784 students consisting of 3,332 9th Street Elementary School students, 917 Liechty Middle School students, and 3,535 Belmont Zone of Choice high school students.

Based on existing enrollment and capacity data from LAUSD, the schools serving the Project and the 50 related projects would not have adequate seating capacity. Specifically, with the addition of students generated by the Project in combination with the

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

No.	Project Name	Description[a]	Size	9th St. ES	Liechty MS	Belmont Zone of Choice HS[d]
1	Equity Residential Mixed-Use 340 S. Hill St.	Apartments	406 du	93	25	53
		Affordable Apartments	22 du	5	2	3
		Office	2,980 sf	2	1	1
		Retail	2,630 sf	1	1	1
2[b]	5th & Olive (formerly Park Fifth Project) 437 S. Hill St.	Condominiums	660 du	150	41	86
		Restaurant	13,742 sf	5	2	3
3[b]	Mixed-Use 400 S. Broadway	Apartments	450 du	103	28	59
		Retail	6,904 sf	3	1	2
		Bar	5,000 sf	2	1	1
4	4th & Spring Hotel 361 S. Spring St.	Hotel	315 rm	30	8	17
		Meeting Space	2,000 sf	2	1	1
5	5th & Hill 323 W. 5th St.	Hotel	190 rm	18	5	11
		Meeting Room	6,100 sf	3	1	2
		Apartments	31 du	8	2	5
		Restaurant	29,200 sf	11	3	6
6[d]	Grand Avenue Project 100 S. Grand Ave.	Apartments	412 du	—	—	54
		Condominiums	1,648 du	—	—	214
		Retail	225,300 sf	—	—	45
		Supermarket	53,000 sf	—	—	11
		Restaurant	67,000 sf	—	—	14
		Health Club	50,000 sf	—	—	10
		Event Facility[e]	250 seats	—	—	0
		Hotel	275 rm	—	—	15
		Office	681,000 sf	—	—	215
7[b]	Hellman/Banco Building 354 S. Spring St.	Apartments	212 du	49	13	28
8	Tribune (LA Times) South Tower Project 222 E. 2nd St.	Condominiums	107 du	25	—	14
		Office	534,044 sf	295	—	169
		Retail	7,200 sf	3	—	2
9	433 South Main Street 433 S. Main St.	Condominiums	196 du	45	12	26
		Retail	5,300 sf	2	1	2
		Restaurant	900 sf	1	1	1
10	Medallion Phase 2 300 S. Main St.	Apartments	471 du	107	29	62
		Restaurant	27,780 sf	10	3	6
		Retail	5,190 sf	2	1	2
11	Mixed-Use (Times Mirror Square) 100 S. Broadway	Apartments	1,127 du	256	—	147
		Office	285,088 sf	158	—	90
		Supermarket	50,000 sf	18	—	10
		Restaurant	75,589 sf	27	—	15
12	Budokan of Los Angeles 237 S. Los Angeles St.	Sports Complex	43,453 sf	27	—	16

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

No.	Project Name	Description[a]	Size	9th St. ES	Liechty MS	Belmont Zone of Choice HS[d]
13	Mixed-Use 601 S. Main St.	Apartments	452 du	103	28	59
		Retail	25,000 sf	9	3	5
14	Spring Street Hotel 633 S. Spring St.	Hotel	176 rm	17	5	10
		Bar	5,290 sf	2	1	2
		Restaurant	8,430 sf	3	1	2
15	Broadway Mixed-Use 955 S. Broadway	Apartments	163 du	37	10	22
		Retail	6,406 sf	3	1	2
16[b,c]	Wilshire Grand Project 900 W. Wilshire Blvd	Hotel	560 rm	—	15	31
		Apartments	100 du	—	7	13
		Office	150,000 sf	—	23	48
		Retail/Restaurant	275,000 sf	—	26	55
17	LA Civic Center Office 150 N. Los Angeles St.	Office	712,500 sf	—	—	225
		Retail	35,000 sf	—	—	7
		Child Care	2,500 sf	—	—	1
18[b]	Mixed-Use 737 S. Spring St.	Apartments	320 du	73	20	42
		Pharmacy/Drugstore	25,000 sf	9	3	5
19[b]	Mixed-Use 732 S. Spring St.	Apartments	400 du	91	25	52
		Retail	15,000 sf	6	2	3
20	8th/Grand/Hope Project 754 S. Hope St.	Condominiums	409 du	93	25	54
		Retail	7,329 sf	3	1	2
21	Beaudry Ave & 2nd St. Mixed-Use Project 130 S. Beaudry Ave.	Apartments	220 du	—	—	29
		Other	9,000 sf	—	—	2
22[b]	Mixed-Use 820 S. Olive St.	Apartments	589 du	134	36	77
		Retail	4,500 sf	2	1	1
23	Mixed-Use 840 S. Olive St.	Condominiums	303 du	69	19	40
		Restaurant	9,680 sf	4	1	2
24	7th & Maple Mixed-Use 701 S. Maple Ave.	Apartments	452 du	103	—	—
		Retail	6,800 sf	3	—	—
		Restaurant	6,800 sf	3	—	—
25	Mitsui Fudosan (Eighth and Figueroa Tower) 744 S. Figueroa St.	Apartments	436 du	—	27	57
		Restaurant	3,750 sf	—	1	1
		Retail	3,750 sf	—	1	1
26	945 West 8th Street 945 W. 8th St.	Apartments	781 du	—	48	102
		Commercial	6,700 sf	—	1	2
27	Mixed-Use 755 S. Los Angeles St.	Office	60,243 sf	34	—	—
		Retail	16,694 sf	6	—	—
		Restaurant	26,959 sf	10	—	—
28	Alexan South Broadway 850 S. Hill St.	Apartments	305 du	70	19	40
		Retail	3,500 sf	2	1	1
		Restaurant	3,500 sf	2	1	1

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

No.	Project Name	Description[a]	Size	9th St. ES	Liechty MS	Belmont Zone of Choice HS[d]
29	845 Olive & 842 Grand Mixed-Use 845 S. Olive St.	Apartments	208 du	48	13	27
		Retail	2,430 sf	1	1	1
30	Embassy Tower 848 S. Grand Ave.	Condominiums	420 du	96	26	55
		Retail	38,500 sf	14	4	8
31	Southern California Flower Market Project 755 S. Wall St.	Apartments	323 du	74	—	—
		Office	53,200 sf	30	—	—
		Commercial	8,820 sf	4	—	—
32	Tenten Wilshire Expansion (The Icon) 1027 W. Wilshire Blvd	Condominiums	402 du	—	25	53
		Retail	4,728 sf	—	1	1
33	Weingart Tower—Affordable Housing 554 S. San Pedro St.	Affordable Apartments	378 du	86	—	1
		Market-Rate Apartments	4 du	1	—	1
		Retail	1,758 sf	1	—	1
		Office	4,410 sf	3	—	2
		Flex	5,932 sf	4	—	3
34	1018 West Ingraham Street 1018 W. Ingraham St.	Apartments	43 du	—	3	6
		Retail	7,400 sf	—	1	2
35	Mixed-Use 609 E. 5th St.	Apartments	151 du	35	—	20
36	Sapphire Mixed-Use (Revised) 1111 W. 6th St.	Apartments	362 du	—	23	47
		Retail	25,805 sf	—	3	6
37	600 South San Pedro Street 600 S. San Pedro St.	Apartments	303 du	69	—	—
		Commercial	19,909 sf	7	—	—
38	Hill Street Mixed-Use 920 S. Hill St.	Apartments	239 du	55	15	31
		Retail	5,400 sf	2	1	2
39	Ferrante 1000 W. Temple St.	Apartments	1,500 du	—	—	195
		Retail	30,000 sf	—	—	6
40	655 South San Pedro Street Residential 655 S. San Pedro St.	Apartments	81 du	19	—	—
41[b]	Broadway Palace 928 S. Broadway	Apartments	667 du	152	41	87
		Condominiums	17 du	4	2	3
		Retail	58,800 sf	21	6	12
42[b]	La Plaza Cultura Village 527 N. Spring St.	Apartments	345 du	—	—	45
		Retail	23,000 sf	—	—	5
		Specialty Retail	21,000 sf	—	—	5
		Restaurant	11,000 sf	—	—	3
43	Mixed-Use 1322 W. Maryland St.	Apartments	47 du	—	3	7
		Retail	760 sf	—	1	1
44	Mixed-Use 700 W. Cesar Chavez Ave.	Apartments	300 du	—	—	39
		Retail	8,000 sf	—	—	2

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

No.	Project Name	Description[a]	Size	9th St. ES	Liechty MS	Belmont Zone of Choice HS[d]
45	Hotel & Apartments 675 S. Bixel St.	Apartments	422 du	—	26	55
		Hotel	126 rm	—	4	7
		Retail	4,874 sf	—	1	1
46	949 South Hope Street Mixed-Use Development 949 S. Hope St.	Apartments	236 du	—	15	31
		Retail	5,954 sf	—	1	2
47	940 South Hill Mixed-Use 940 S. Hill St.	Apartments	232 du	53	15	31
		Retail	14,000 sf	5	2	3
48	Residential 350 S. Figueroa St.	Apartments	570 du	—	35	74
49	333 South Figueroa Street 333 S. Figueroa St.	Apartments	224 du	—	14	30
		Condominiums	242 du	—	15	32
		Hotel	599 rm	—	1	1
		Commercial	28,705 sf	—	3	6
50	Figueroa Centre 911 S. Figueroa St.	Hotel	220 rm	—	6	12
		Apartments	200 du	—	13	26
		Commercial	94,080 sf	—	9	19
Total Related Projects				**3,136**	**863**	**3,422**
Project				**196**	**54**	**113**
Related Projects + Project				**3,332**	**917**	**3,535**

du = dwelling units

rm = rooms

sf = square feet

N/A = Information is not available

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

[a] *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]. Retrieved December 13, 2016, from Cornell University, School of Hospitality Administration site, http://scholarship.sha.cornell.edu/articles/310/.*

[b] *Based on student generation factors provided in the LAUSD 2020 Developer Fee Justification Study, Tables 3 and 15, March 2020. The 2018 LAUSD Developer Fee Justification Study provides student generation rates for Grades K–6, 7–8, and 9–12. For residential uses of the related projects, the following student generation rates were used from Table 3: 0.2269 student per household for Grades K–6, 0.0611 student per household for Grades 7–8, and 0.1296 student per household for Grades 9–12. For 9th Street Elementary School (Grades K–5), the student generation rate listed for Grades K–6 is used. For Liechty Middle School (Grades 6–8), the student generation rate listed for Grades 7–8 is used. For commercial uses, the student generation rate from Table 15 of 0.638 student per 1,000 square feet for "Neighborhood Shopping Center" is applied. For hotel uses, the student generation rate from Table 15 of 0.266 per 1,000 square feet is applied. For office uses, the student generation rate from Table 15 of 1.015 students per 1,000 square feet is applied. Since the LAUSD Developer Fee Justification Study does not specify the grade levels of students that are generated from non-residential land uses, such students are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 54.3 percent for elementary school, 14.6 percent for middle school, and 31.0 percent for high school).*

[c] *The 2020 LAUSD Developer Fee Justification Study does not provide student generation factors for restaurant, bar, supermarket, pharmacy/drug store, health club, and child care land uses. Therefore, the highest available rate for comparable land uses is applied (i.e., 0.638 student per 1,000 square feet for "Neighborhood Shopping Centers").*

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

No.	Project Name	Description[a]	Size	9th St. ES	Liechty MS	Belmont Zone of Choice HS[d]

The LAUSD Developer Fee Justification Study does not provide student generation factors for sports complex and flex land uses. Therefore, the highest available rate for comparable land uses is applied (i.e., 1.128 students per 1,000 square feet for "Standard Commercial Office").

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

[e] *This related project provides units per seats for event facility uses. The LAUSD 2020 Developer Fee Justification Study does not provide student generation rates per units of seats for event facility uses. Therefore, this related project is not expected to generate students at the identified schools within the Project's vicinity.*

Source: Eyestone Environmental, 2020.

50 related projects, 9th Street Elementary School would have a shortage of 3,249 seats (i.e., the existing excess capacity of 83 seats minus the 3,332 students generated by the Project and related projects). Liechty Middle School would have a shortage of 1,400 seats (i.e., the existing shortage of 483 seats in addition to the 917 students generated by the Project and related projects) and Belmont Zone of Choice high schools would have a shortage of 3,866 seats (i.e., the existing shortage of 331 seats in addition to the 3,535 students generated by the Project and related projects).

With regard to projected future capacity data for the next five years from LAUSD, 9th Street Elementary School would have a shortage of 3,310 seats (i.e., the future excess of 22 seats minus the 3,332 students generated by the Project and related projects). Liechty Middle School would experience a shortage of 1,488 seats (i.e., future shortage of 571 seats in addition to the 917 students generated by the Project and related projects) and Belmont Zone of Choice high schools would have a shortage of 3,582 seats (i.e., the future shortage of 47 seats minus the 3,535 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 50 related projects within the school attendance boundaries, would cause seating shortages at 9th Street Elementary School, Liechty Middle School, and Belmont Zone of Choice high schools. The Project would only comprise approximately 4.7 percent of the total estimated cumulative growth in students. Nevertheless, overall cumulative growth would substantially increase the demand for LAUSD services in the Project Site vicinity, which could result in a need for new school facilities in the future.

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.[33] However, no new school construction is currently planned in the Project vicinity at this time.[34] 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 Senate Bill 50. As discussed above, pursuant to Government Code Section 65995, the payment of these fees would be considered full and complete mitigation of school impacts generated by the Project and the related projects. **Therefore, with payment of these fees, the Project and related projects would have a less-than-significant cumulative impact, and no mitigation measures are required.**

(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.

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[33] *LAUSD, Facilities Services Division, 2019 Facilities Services Division Strategic Execution Plan.*

[34] *Letter from Rena Perez, Director of Master Planning and Demographics, LAUSD Facilities Services Division, dated August 22, 2018. See Appendix I.3 of this Draft EIR.*