

IV. Environmental Impact Analysis

J.3 Public Services—Schools

1. Introduction

This section evaluates whether new or physically altered school facilities would be required to provide school services to the Project, the construction of which could cause significant environmental impacts. The analysis estimates the number of students that would be generated by the Project based on Los Angeles Unified School District (LAUSD) student generation rates and addresses whether LAUSD school facilities would have sufficient capacity to accommodate these students. The analysis discusses state-required developer mitigation fees and addresses all levels of educational facilities operated by LAUSD (i.e., elementary, middle, and high schools). The analysis is based, in part, on written correspondence with LAUSD dated January 22, 2021, which is included in Appendix O, of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

There are several plans, policies, and programs regarding schools at the state, regional, and local levels. Described below, these include:

- California Education Code
- Senate Bill 50
- Open Enrollment Policy (California Education Code Sections 48350, et seq.)
- Class Size Reduction Kindergarten-University Public Education Facilities Bond Act of 1998
- LAUSD Strategic Plan 2016–2019
- City of Los Angeles General Plan, including:
 - Framework Element
 - Community Plan

(1) State

(a) California Education Code

Educational services and school facilities for the Project are subject to the rules and regulations of the California Education Code, the California Department of Education (CDE), and governance of the State Board of Education (SBE) (Gov. Code Section 33000, et seq.). The CDE is the government agency responsible for public education throughout the state. With the State Superintendent of Public Instruction, the CDE is responsible for enforcing education law and regulations and for continuing to reform and improve public elementary school, secondary school, childcare programs, adult education, and preschool programs. The CDE oversees funding, and student testing and achievement levels for all state schools. A sector of the CDE, the SBE is the 11-member governing and policymaking body of the CDE that sets Kindergarten through 12th Grade (K–12) education policy in the areas of standards, instructional materials, assessment, and accountability. The State also provides funding through a combination of sales and income taxes. In addition, pursuant to Proposition 98, the State is also responsible for the allocation of educational funds that are acquired from property taxes. Further, the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities.¹

(b) Senate Bill 50

The Leroy F. Greene School Facilities Act of 1998 (known as the Greene Act or Senate Bill [SB] 50), enacted in 1998, is a program for funding school facilities largely based on matching funds. For new school construction, grants provide funding on a 50/50 State and local match basis. For school modernization, grants provide funding on a 60/40 State and local match basis. Districts that are unable to provide some, or all, of the local match requirement and are able to meet the financial hardship provisions may be eligible for additional State funding.²

The Greene Act permits the local district to levy a fee, charge, dedication, or other requirement against any development project within its boundaries, for the purpose of funding the construction or reconstruction of school facilities. The Act also sets a maximum level of fees a developer may be required to pay. Pursuant to Government Code Section 65996, the payment of these fees by a developer serves to mitigate all potential impacts on

¹ *California Education Code Section 17620(a)(1).*

² *State of California, Office of Public School Construction, School Facility Program Guide, October 24, 2012.*

school facilities that may result from implementation of a project to a less-than-significant level.³

(c) Open Enrollment Policy (California Education Code Sections 48350, et seq.)

The open enrollment policy is a state-mandated policy that enables students located in the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated “open enrollment” seats. Open enrollment seats are granted through an application process that is completed before the school year begins. Under the Open Enrollment Policy, students living in a particular school’s attendance area are not displaced by a student requesting an open enrollment transfer to that school.⁴

(d) Class Size Reduction Kindergarten—University Public Education Facilities Bond Act of 1998

Proposition 1A, the Class Size Reduction Kindergarten—University Public Education Facilities Bond Act of 1998 (Education Code, Section 100400–100405) is a school construction funding measure that was approved by the voters on the November 3, 1998, ballot. This Act created the School Facility Program where eligible school districts may obtain state bond funds.

(2) Regional

(a) Los Angeles Unified School District

As discussed 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, 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. Pursuant to the Greene Act, LAUSD collects developer fees for new construction within its boundaries. The LAUSD School Facilities Needs Analysis has been prepared to support the school district’s levy of the fees authorized by Section 17620 of the California Education Code.

³ California Government Code Section 65996.

⁴ LAUSD Open Enrollment Website, <https://achieve.lausd.net/K12OpenEnrollment>, accessed February 18, 2021.

Payment of these fees would be mandatory for the Applicant, and would fully mitigate any impact upon school services generated by the Project.⁵

(i) LAUSD Strategic Plan 2016–2019

The LAUSD Strategic Plan 2016–2019 (Strategic Plan) represents the LAUSD’s framework towards a commitment to 100 percent graduation. In following the Strategic Plan’s fundamental strategy, the LAUSD will direct 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: (1) Build a Solid Foundation for Early Learners; (2) Proficiency for All; (3) 100 Percent Attendance; (4) Parent, Community, and Student Engagement; (5) School Safety. Furthermore, the Strategic Plan provides key initiatives to achieve these commitments from which implementation plans will be created. Plans will be structured to include specific action steps, responsibilities, and timelines. As such, the LAUSD will be able to monitor and measure progress and provide accountability during the Strategic Plan’s implementation process. As of February 2022, the 2016-2019 Strategic Plan is the most current available.

(ii) LAUSD Choices Program

LAUSD provides education choices including magnet and permits with transportation programs to students residing within the LAUSD boundaries. Students interested in enrolling in LAUSD magnet and PWT programs are required to apply through LAUSD eChoices. Magnet schools under the Choice Program include business, communication arts, center for enriched studies, gifted/highly gifted/high ability, liberal arts, magnet schools assistance program, public service, science/technology/engineering/math, and visual and performing arts.⁶

(3) Local Level

(a) Los Angeles General Plan

(i) Framework Element

Chapter 9, Infrastructure and Public Services of the Framework Element includes goals, objectives, and policies applicable to public schools; these are summarized in Table IV.J.3-1 on page IV.J.3-5.

⁵ Los Angeles Unified School District, 2020 Developer Justification Study, March 2020.

⁶ LAUSD, e-Choices Magnet Programs, <https://echoices.lausd.net/magnet#gsc.tab=0>, accessed February 10, 2021.

**Table IV.J.3-1
Relevant General Plan School Goals, Objectives, and Policies:
Framework Element—Chapter 9 Infrastructure and Public Services**

Goal 9N	Public schools that provide a quality education for all of the City's children, including those with special needs, and adequate school facilities to serve every neighborhood in the City so that students have an opportunity to attend school in their neighborhoods.
Objective 9.31	Work constructively with the Los Angeles Unified School District to monitor and forecast school service demand based upon actual and predicted growth.
Policy 9.31.1	Participate in the development of, and share demographic information about, population estimates.
Objective 9.32	Work constructively with Los Angeles Unified School District to promote the siting and construction of adequate school facilities phased with growth.
Policy 9.32.1	Work with the Los Angeles Unified School District to ensure that school facilities and programs are expanded commensurate with the City's population growth and development.
Policy 9.32.2	Explore creative alternatives for providing new school sites in the City, where appropriate.
Policy 9.32.3	Work with LAUSD to explore incentives and funding mechanisms to provide school facilities in areas where there is a deficiency in classroom seats.
Objective 9.33	Maximize the use of local schools for community use and local open space and parks for school use.
Policy 9.33.1	Encourage a program of decision-making at the local school level to provide access to school facilities by neighborhood organizations.
Policy 9.33.2	Develop a strategy to site community facilities (libraries, parks, schools, and auditoriums) together.
<hr/> <i>Source: City of Los Angeles 2001.</i>	

(a) Community Plan

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the Framework Element at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to schools required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities.

As discussed in Section IV.G, Land Use, of this Draft EIR, the Project is located within the North Hollywood–Valley Village Community Plan (Community Plan) area.

Adopted on May 14, 1996, the Community Plan does not include specific policies or objectives related to schools, but states that elementary schools should be located on sites that are safe, conveniently accessible, and free from heavy traffic, excessive noise, and incompatible land uses and that schools and local recreational facilities should be located near each other whenever possible.⁷ The Community Plan also includes “features” to provide opportunities for the development of school sites as needed, proposing the dual use of school facilities for the general public after hours and on weekends, and encouraging the location of childcare centers on or near school sites in order to provide for the needs of working mothers and single-parent families.⁸

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.⁹ During the 2020–2021 school year, LAUSD provided kindergarten through high school (Grades K–12) education to approximately 550,779 students enrolled throughout 1,413 schools and centers. These include 18 primary school centers, 439 elementary schools, 77 middle schools, 88 senior high schools, 54 option schools, 65 magnet schools, 28 multi-level schools, 12 special education schools, two home/hospital centers, 245 magnet centers on regular campuses (Grades K–12), 231 charter schools, and 154 other schools and centers.¹⁰ The LAUSD is divided into six local districts, and the Project Site is located in the Northeast Local District.¹¹

As discussed above, SB 50 provides funding for the construction of new school facilities. Other major statewide funding sources for school facilities include Proposition 47 and 55. Proposition 47 is a \$13.2 billion bond approved in November 2002 and provides \$11.4 billion for K–12 public school facilities. Proposition 55 is a \$12.3 billion bond approved in March 2004 and provides \$10 billion to address overcrowding and accommodate future growth in K–12 public schools. The LAUSD's voter-approved Bond

⁷ *The Los Angeles Department of City Planning is currently preparing the Southeast Valley Community Plan Update, which includes the North Hollywood–Valley Village Community Plan area (see <https://planning.lacity.org/plans-policies/community-plan-update/southeast-valley-community-plan-update>). As of February 2022, a draft of the revised community plan has not been released. For purposes of this Draft EIR, the analysis is limited to the designations under the currently adopted Community Plan.*

⁸ *City of Los Angeles, North Hollywood – Valley Village Community Plan, adopted May 14, 1996, p. III-6.*

⁹ *LAUSD, Fingertip Facts 2020–2021.*

¹⁰ *LAUSD, Fingertip Facts 2020–2021.*

¹¹ *LAUSD, Local District Map, <http://achieve.lausd.net/domain/34>, accessed February 10, 2021.*

Program is currently valued at \$26.36 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 171,000 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.¹²

(a) Public Schools

As shown in Figure IV.J.3-1 on page IV.J.3-8, the public schools serving the Project Site are Lankershim Elementary, Walter Reed Middle School, North Hollywood Senior High, and East Valley Senior High.¹³ These schools currently operate under a single-track calendar in which instruction generally begins in early September and continues through late June. Table IV.J.3-2 on page IV.J.3-9 presents the academic year capacity, enrollment, and seating shortages/overages for each of these schools during the most recent school year (2019–2020) for which data is available. All data presented in the table already take into account the use of portable classrooms on site, additions being built onto existing schools, student permits and transfers, specific educational programs running at the schools, and any other operational activities or educational programming that affect the capacities and enrollments of the schools.¹⁴ According to LAUSD, the calculation of available capacity (seating overage/shortage) is based on the resident enrollment compared to the respective school's capacity. Resident enrollment is defined as the total number of students living in the school's attendance area who are eligible to attend the school, including magnet students, and actual enrollment is defined as the number of students actually attending the school currently, including magnet students.

The goal of the calculation is to determine the number of seats that are available for students residing within the attendance boundary. LAUSD considers a school to be overcrowded if any one of the following occurs: (1) it currently operates on a multi-track

¹² LAUSD Facilities Services Division, *Facilities Services Division Strategic Execution Plan 2020*.

¹³ LAUSD, *Resident School Identifier*, <http://rsi.lausd.net/ResidentSchoolIdentifier/>, accessed February 10, 2021.

¹⁴ Letter from Vincent Maffei, Director, LAUSD, Facilities Services Division, dated January 22, 2021. See Appendix O of this Draft EIR.



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

Table IV.J.3-2
Existing (2019–2020) Enrollment and Capacity of LAUSD Schools that Serve the Project Site

School Name	Current Capacity^a	Resident Enrollment^b	Actual Enrollment^c	Current Seating Overage/ (Shortage)^d	Overcrowded Now^d
Lankershim Elementary	364	457	337	(93)	Yes
Walter Reed Middle School	1,532	1,307	1,682	255	No
North Hollywood Senior High	2,664	2,875	2,589	(211)	Yes
East Valley Senior High	709	841	489	(132)	Yes
<p>() = negative number</p> <p>^a School's current operating capacity, or the maximum number of students the school can serve while operating on its current calendar. Excludes capacity used by charter co-locations. Includes capacity for magnet programs.</p> <p>^b Total number of students living in the school's attendance area who are eligible to attend the school. Includes magnet students.</p> <p>^c Number of students actually attending the school currently, including magnet students.</p> <p>^d Seating overage or (shortage) and overcrowding based on capacity minus resident enrollment.</p> <p>Source: Letter from Vincent Maffei, Director, LAUSD, Facilities Services Division, dated January 22, 2021. See Appendix O of this Draft EIR.</p>					

calendar; (2) there is currently a capacity shortage; or (3) there is currently a capacity overage of less than or equal to a "safety margin" of 20 seats.

The LAUSD also projects the future capacity of its schools for the next five years.¹⁵ Table IV.J.3-3 on page IV.J.3-10 shows the LAUSD's projected capacity at each of the schools serving the Project Site and vicinity, which are further discussed below.

(i) Lankershim Elementary

Lankershim Elementary is located at 5250 Bakman Avenue, approximately 0.05 mile south of the Project Site, and offers instruction for grades K–5 on a single-track calendar. During the 2019–2020 academic year, Lankershim Elementary had a total capacity for 364 students, a residential enrollment of 457 students, and an actual enrollment of

¹⁵ As described in Section II, Project Description, of this Draft EIR, Project construction is anticipated to be carried out in multiple, potentially overlapping phases over a period of approximately 15 years, with full buildout anticipated in 2037. LAUSD projects future enrollment and capacity in five-year increments based on the most recent school year for which data is available, which is currently for the 2019–2020 school year. Therefore, projected future enrollment and capacity data considered in this analysis is for the 2024–2025 school year.

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

School Name	Projected Capacity^a	Projected Resident Enrollment^b	Projected Seating Overage/ (Shortage)^c	Overcrowding Projected in Future
Lankershim Elementary	364	418	(54)	Yes
Walter Reed Middle School	1,532	1,233	299	No
North Hollywood Senior High	2,664	2,913	(249)	Yes
East Valley Senior High	709	775	(66)	Yes
<p>(xx) = negative number</p> <p>^a Schools planning capacity. Excludes capacity used by charter co-locations. Includes capacity for magnet program. As indicated in its January 22, 2021, letter included as Appendix O of this Draft EIR, LAUSD assumed future capacity is the same as current capacity.</p> <p>^b Projected five-year total number of students living in the school's attendance area and who are eligible to attend the school. Includes magnet students.</p> <p>^c Per the LAUSD, projected seating overage/(shortage) is projected capacity minus projected resident enrollment.</p> <p>Source: Letter from Vincent Maffei, Director, LAUSD, Facilities Services Division, dated January 22, 2021. See Appendix O of this Draft EIR.</p>				

337 students. Therefore, since the school's capacity of 364 students is less than the residential enrollment of 457 students, Lankershim Elementary is considered overcrowded under existing conditions.

LAUSD's five-year projection for Lankershim Elementary indicates that the school is projected to have the same capacity as under existing conditions of 364 students and a projected resident enrollment of 418 students, resulting in a projected seating shortage of 54 seats. Therefore, Lankershim Elementary is projected to experience overcrowding in the future.

(ii) Walter Reed Middle School

Walter Reed Middle School is located at 4525 Irvine Avenue, approximately 1.1 miles southwest of the Project Site, and offers instruction for grades 6–8 on a single-track calendar. During the 2019–2020 academic year, Walter Reed Middle School had a total capacity for 1,532 students, a residential enrollment of 1,307 students, and an actual enrollment of 1,682 students. Therefore, since the school's available capacity of 1,532 students is more than the residential enrollment of 1,307 students, Walter Reed Middle School is not considered overcrowded under existing conditions.

LAUSD's five-year projection for Walter Reed Middle School indicates that the school is projected to have a capacity for 1,532 students and a projected residential enrollment of 1,233 students, resulting in a projected seating overage of 299 seats. Therefore, Walter Reed Middle School is not projected to experience overcrowding in the future.

(iii) North Hollywood Senior High

North Hollywood Senior High is located at 5231 Colfax Avenue, approximately 0.7 mile west of the Project Site, and offers instruction for grades 9–12 on a single-track calendar. During the 2019–2020 academic year, North Hollywood Senior High had a total capacity for 2,664 students, a resident enrollment of 2,875 students, and an actual enrollment of 2,589 students. Therefore, since the school's available capacity of 2,664 students is less than the residential enrollment of 2,875 students, North Hollywood Senior High is considered overcrowded under existing conditions.

LAUSD's five-year projection for North Hollywood Senior High indicates that the school is projected to have a capacity for 2,664 students and a projected residential enrollment of 2,913 students, resulting in a projected seating shortage of 249 seats. Therefore, North Hollywood Senior High is projected to experience overcrowding in the future.

(iv) East Valley Senior High

East Valley Senior High is located at 5525 Vineland Avenue, approximately 0.23 mile northeast of the Project Site, and offers instruction for grades 9–12 on a single-track calendar. During the 2019–2020 academic year, East Valley Senior High had a total capacity for 709 students, a resident enrollment of 841 students, and an actual enrollment of 489 students. Therefore, since the school's available capacity of 709 students is less than the residential enrollment of 841 students, East Valley Senior High is considered overcrowded under existing conditions.

LAUSD's five-year projection for East Valley Senior High indicates that the school is projected to have a capacity for 709 students and a projected residential enrollment of 775 students, resulting in a projected seating shortage of 66 seats. Therefore, East Valley Senior High is projected to experience overcrowding in the future.

(b) Charter Schools

Charter schools originated from the Charter School Act of 1992. Typically, a charter is granted by the LAUSD Board of Education and approved by the state for a period of up to five years. LAUSD maintains two types of charter schools: conversion charters, which

are existing LAUSD schools that later become charters; and start-ups, which are charter schools that are newly created by any member of the public (e.g., educators, parents, foundations, and others). Charter schools are open to any student residing in the State of California who wishes to attend. If the number of students who wish to attend a charter school exceeds the school's capacity, the school determines admission based on a lottery.¹⁶ LAUSD has over 280 independent and affiliated charter schools within its jurisdiction, serving over 138,000 students in grades kindergarten through 12th grade.¹⁷ The charter schools in the vicinity of the Project Site include New Horizons Charter Academy and Colfax Charter Elementary School.¹⁸ 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.

(c) 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 322 magnet programs located within the LAUSD.¹⁹ Magnet programs are offered at the following schools within two miles of the Project Site: The Science Academy STEM Magnet, North Hollywood Senior High Highly Gifted Magnet, Maurice Sendak Elementary Arts/Comm/Technology Magnet, Burbank Boulevard Elementary Gifted Global Learning Magnet, and Roy Romer Middle Gifted/Humanities Magnet.²⁰ Since

¹⁶ LAUSD, Charter Schools Division, About Charter Schools, <http://achieve.lausd.net/Page/1816>, accessed February 10, 2021.

¹⁷ LAUSD, Charter Schools Division, About Charter Schools, <http://achieve.lausd.net/Page/1816>, accessed February 10, 2021.

¹⁸ California Charter Schools Association (CCSA), Find a Charter School, www.ccsa.org/schools/, accessed February 10, 2021.

¹⁹ LAUSD, Student Integrated Services, e-choices, Magnet Programs, <https://echoices.lausd.net/Home/fq#gsc.tab=0>, accessed February 10, 2021.

²⁰ LAUSD, Enrollment, School Finder Tool, [https://explorelausd.schoolmint.net/school-finder/results/?address.direction=&address.name=Lankershim&address.number=5311&address.point.lat=34.1673362321068&address.point.lng=118.37615598848846&address.postal=91601&address.query=5311%20Lankershim%20Blvd%2C%20North%20Hollywood%2C%20CA%2C%2091601%2C%20USA&address.suffix=%20Blvd&address.suffixDirection=&address.type=location&id&parent_id&preferred_location_code&programs\[\]=magnet_theme.magnet_liberal_arts&programs\[\]=magnet_theme.magnet_highly_gifted&programs\[\]=magnet_theme.ma](https://explorelausd.schoolmint.net/school-finder/results/?address.direction=&address.name=Lankershim&address.number=5311&address.point.lat=34.1673362321068&address.point.lng=118.37615598848846&address.postal=91601&address.query=5311%20Lankershim%20Blvd%2C%20North%20Hollywood%2C%20CA%2C%2091601%2C%20USA&address.suffix=%20Blvd&address.suffixDirection=&address.type=location&id&parent_id&preferred_location_code&programs[]=magnet_theme.magnet_liberal_arts&programs[]=magnet_theme.magnet_highly_gifted&programs[]=magnet_theme.ma)
(Footnote continued on next page)

enrollment is application-based for magnet schools, overcrowding is not determined for magnet schools.

(d) Pilot Schools

Pilot schools are a network of public schools that have autonomy over budget, staffing, governance, curriculum and assessment, and the school calendar.²¹ Pilot schools were established in February 2007 when a Memorandum of Understanding was ratified by the LAUSD and the United Teachers Los Angeles, a union of professionals representing 31,000 public school teachers and health and human services professionals in Los Angeles, to create and implement 10 small, autonomous Belmont Pilot Schools within LAUSD Local District 4 with a specific focus on creating new, innovative schools to relieve overcrowding at Belmont High School.²² Currently, there are 44 pilot schools located within the LAUSD.²³

(e) Proposed New Public Schools

LAUSD Facilities Services Division is managing a currently \$26.36 billion program to build new schools to reduce overcrowding and modernize existing campuses throughout LAUSD's service area. To date, 583 new projects providing more than 171,000 new seats have been constructed, and more than 22,000 school repair and modernization projects have completed construction to provide upgraded facilities.²⁴ According to LAUSD, there are no new proposed public schools planned to be built in the vicinity of the Project Site.²⁵

(2) Private Schools in the Project Vicinity

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. Private school facilities generally have smaller student populations and higher teacher to student ratios than their public counterparts. This information is presented for factual

gnet_gifted&programs[]=magnet_theme.magnet_comm_arts&programs[]=magnet_theme.magnet_center_enriched_studies&programs[]=magnet_theme.magnet_business&sort=match_score&sortToHide, accessed February 18, 2021.

²¹ LAUSD, *Pilot Schools, FAQ*, <https://achieve.lausd.net/Page/2830>, accessed February 10, 2021.

²² LAUSD, *History of Pilot Schools*, <https://achieve.lausd.net/Page/2841>, accessed February 10, 2021.

²³ LAUSD, *History of Pilot Schools*, <https://achieve.lausd.net/Page/2841>, accessed February 10, 2021.

²⁴ LAUSD Facilities Services Division, *Facilities Services Division Strategic Execution Plan 2020*.

²⁵ Letter from Vincent Maffei, Director of Master Planning and Demographics, LAUSD Facilities Services Division, dated January 22, 2021. See Appendix O of this Draft EIR.

purposes only, as it does not directly relate to current and future enrollment capacity levels of schools in the LAUSD before or after implementation of the Project.

3. Project Impacts

a. Thresholds of Significance

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

Threshold (a): Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, 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 questions.

The L.A. CEQA Thresholds Guide identifies the following criteria to evaluate schools:

- The population increase resulting from the project, based on the increase in residential units or square footage of non-residential floor area;
- The demand for school services anticipated at the time of project buildout compared to the expected level of service available, and to consider as applicable, scheduled improvements to LAUSD services (facilities, equipment and personnel) and the project's proportional contribution to the demand;
- Whether (and the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions which would create a temporary or permanent impact on the school(s); and
- Whether the project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to the LAUSD).

b. Methodology

Operation-related impacts on schools were quantitatively analyzed to assess the ability of the LAUSD to accommodate the student population that would be generated by the Project. The anticipated number of students that would be generated by the Project was calculated by applying the student generation rates from the 2020 LAUSD Developer Fee Justification Study.²⁶

This analysis focuses on public schools that would serve the Project Site. This analysis does not take into account the LAUSD options that would allow students generated by the Project to enroll at other LAUSD schools located away from their home attendance area, or students who may enroll in private schools or participate in home schooling. In any case, students who opt to enroll within districts other than their home districts are required to obtain inter-district transfer permits to ensure that existing facilities of the incoming schools would not suffer impacts due to the additional enrollment. Additionally, this analysis is also conservative as it does not account for the fact that there are several public school options such as charter schools and magnet schools, as well as private school options in the Project Site vicinity that could also serve Project residents, nor does it account for the Project's future residents who may already reside in the school attendance boundaries and would move to the Project Site.²⁷

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?

²⁶ Los Angeles Unified School District, 2020 Developer Fee Justification Study, March 2020.

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

(b) Operation

As discussed in Section II, Project Description, of this Draft EIR, the Project would include the demolition of 49,111 square feet of existing industrial/warehouse space, and the development of 103,400 square feet of retail/restaurant space, 1,527 multi-family residential units, and 580,374 square feet of office space. The Project also includes a potential land use exchange of up to 75,000 square feet of retail/restaurant uses for up to 75,000 square feet of office space should future market conditions warrant.

As noted above, the Project would include development of new residential units, office, and commercial space. As shown in Table IV.J.3-4 on page IV.J.3-17, using the applicable LAUSD student generation rates for the Project's land uses, the Project would generate approximately 1,387 new students consisting of 754 elementary school students, 203 middle school students, and 430 high school students. As also shown in Table IV.J.3-4, using the applicable LAUSD student generation rates, the existing retail/restaurant and warehouse uses generate approximately 15 students, consisting of eight elementary school students, two middle school students, and five high school students. Thus, when accounting for the removal of the existing warehouse, the Project would result in a net increase of 1,372 students consisting of 746 elementary school students, 201 middle school students, and 425 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

Table IV.J.3-4
Estimated Number of Students Generated by the Project

Land Use ^c	Number of Units	Students Generated ^{a,b}		
		Elementary (K–6)	Middle School (7–8)	High School (9–12)
Residential	1,527 du	346	93	198
Commercial (Retail/Restaurant)	28,400 sf	6	1	3
Office	655,374 sf	402	108	229
Total Students Generated		754	203	430
Existing Restaurant (to remain)	1,725 sf	0	0	0
Existing Warehouse to be removed ^d	49,111 sf	8	2	5
Net New Student Generation		746	201	425

du = dwelling units

sf = square feet

^a Based on student generation factors provided in the LAUSD Developer Fee Justification Study, March 2020. For the residential component, the following student generation rates were used: 0.2269 student per household (grades K–6), 0.0611 student per household (grades 7–8), and 0.1296 student per household (grades 9–12). For the Project's commercial component, the student generation rate of 0.360 student per 1,000 square feet for "Community Shopping Centers" is applied. For the Project's office component, the student generation rate of 1.128 student per 1,000 square feet for "Standard Commercial Office" is applied. For the Project's warehouse component, the student generation rate of 0.318 student per 1,000 square feet for "Industrial Parks" 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 Numbers may not add up exactly due to rounding.

^c The numbers presented here reflect the Project's potential land use exchange of up to 75,000 square feet of retail/restaurant uses for up to 75,000 square feet of office space should market conditions warrant. The Project, as proposed, would result in 714 elementary school students, 192 middle school students, and 408 high school students. The school service population with the land use exchange therefore presents a more conservative scenario and is evaluated herein.

^d On December 21, 2020, a fire destroyed the existing building on Block 7. Nevertheless, because it was present at the time the NOP was published on July 7, 2020, it is considered part of the existing conditions.

Source: Eyestone Environmental, 2022.

area, or students who may enroll in private schools or participate in home-schooling. In addition, this analysis does not account for Project residents who may already reside in the school attendance boundaries and would move to the Project Site. Other LAUSD options, some of which are discussed above, that may be available to Project students include the following:

- Open enrollment that enables students anywhere within the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated open enrollment seats;
- Magnet schools and magnet centers (such as Lake Balboa College Preparatory Magnet K-12), 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.²⁸ 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, Lankershim Elementary, North Hollywood Senior High, and East Valley Senior High would not have adequate capacity to accommodate the new students generated by the Project under existing conditions. However, Walter Reed Middle School would have the adequate capacity to accommodate the new students generated by the Project under existing conditions. Specifically, as shown in Table IV.J.3-5 on page IV.J.3-19, with the addition of Project-generated students, Lankershim Elementary School would have a seating shortage of 839 students (i.e., existing seating shortage of 93 students in addition to the Project's student generation of 746 students), North Hollywood Senior High would have a seating shortage of 636 students (i.e., existing seating shortage of 211 students in addition to the Project's student generation of 425 students), and East Valley Senior High would have a seating shortage of 557 students (i.e., existing seating shortage of 132 students in addition to the Project's student generation of 425 students). Meanwhile, Walter Reed Middle School would have a seating overage of 24 students (i.e., existing seating overage of 225 students minus the Project's student generation of 201 students).

²⁸ A feeder pattern is the linkage from elementary school, middle school, and high school.

**Table IV.J.3-5
Project Student Capacity**

School Name	Existing (2019) Overage/ Shortage	With Project 2019	Projected (2024) Overage/ Shortage	With Project 2024
Lankershim Elementary	(93)	(839)	(54)	(800)
Walter Reed Middle School	225	24	299	98
North Hollywood Senior High	(211)	(636) ^a	(249)	(674) ^a
East Valley Senior High	(132)	(557) ^a	(66)	(491) ^a
<p>^a <i>Because it is uncertain how many of the Project's 425 net high school students would attend North Hollywood Senior High School versus East Valley Senior High School, it is conservatively assumed that 425 Project high school students would attend each of these schools.</i></p> <p><i>(xx) = negative number</i></p> <p><i>Source: Eyestone Environmental, 2022.</i></p>				

With regard to projected future capacity during the 2024–2025 academic year, Table IV.J.3-5 shows Lankershim Elementary School would have a seating shortage of 800 students (i.e., future seating shortage of 54 students in addition to the Project's student generation of 746 students), North Hollywood Senior High would have a seating shortage of 674 students (i.e., future seating shortage of 249 students in addition to the Project's student generation of 425 students), and East Valley Village Senior High would have a seating shortage of 491 students (i.e., future seating shortage of 66 students in addition to the Project's student generation of 425 students). Meanwhile, Walter Reed Middle School would have a seating overage of 98 students (i.e., future seating overage of 299 students minus the Project's student generation of 201 students).

Pursuant to SB 50, the Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of each building's building permit. Pursuant to Government Code Section 65995, the payment of these fees is considered full and complete mitigation of Project-related school impacts. Therefore, payment of the applicable development school fees to the LAUSD would offset the potential impact of additional student enrollment at schools serving the Project Site. **Accordingly, with adherence to existing regulations, impacts on schools would be less than significant.**

(2) Mitigation Measures

Project-level impacts related to school facilities would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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

d. Cumulative Impacts

(1) Impact Analysis

As identified in Section III, Environmental Setting, of this Draft EIR, there are 34 related projects located in the Project Site vicinity. While not all 34 projects may fall within the attendance boundaries of the schools serving the Project Site, these 34 related projects are considered in this cumulative analysis in order to provide for a conservative analysis.

As shown in Table IV.J.3-6 on page IV.J.3-21, the 34 related projects could potentially generate 411 Lankershim Elementary School students, 137 Walter Reed Middle School students, 183 North Hollywood Senior High students, and 111 East Valley Senior High students, based on the rates provided in the 2020 LAUSD Developer Fee Justification Study.²⁹ As indicated above, the Project would result in a net increase of 1,372 new students consisting of 746 elementary school students, 201 middle school students, and 425 high school students. The Project in combination with the related projects would have the potential to generate a cumulative total of 1,157 Lankershim Elementary School students, 338 Walter Reed Middle School students, 608 North Hollywood Senior High students, and 536 East Valley Senior High students.

Based on existing enrollment and capacity data from LAUSD, the schools serving the Project Site and the related projects would not have adequate capacity. Specifically, as shown in Table IV.J.3-7 on page IV.J.3-25, with the addition of students generated by the Project in combination with the related projects, Lankershim Elementary School would have a seating shortage of 1,250 students (i.e., existing seating shortage of 93 students in addition to the Project plus related projects student generation of 1,157 students), Walter Reed Middle School would have a seating shortage of 113 students (i.e., existing seating overage of 225 students minus the Project plus related projects student generation of 338 students), North Hollywood Senior High would have a seating shortage of 819 students (i.e., existing seating shortage for 211 students in addition to the Project plus related projects student generation of 608 students), and East Valley Senior High would have a seating shortage of 668 students (i.e., existing seating shortage for 132 students in addition to the Project plus related projects student generation of 536 students).

²⁹ Attendance for the related projects is based on attendance boundaries.

**Table IV.J.3-6
Estimated Student Generation from Related Projects**

No. ^a	Project	Description	Size	Students Generated ^b			
				Lankershim Elementary School	Reed Middle School	North Hollywood High School	East Valley High School
1	NoHo Lankershim Station 5401 Lankershim Blvd.	Apartments	127 du	29	8	16	—
		Retail	14,500 sf	3	1	2	—
		Office	1,918 sf	1	0	1	—
2	New NoHo Artwalk Project 11126 Chandler Blvd.	Apartments	73 du	17	4	—	9
		Retail	2,900 sf	1	0	—	0
3	The Weddington 11120 Chandler Blvd.	Apartments	324 du	74	20	—	42
4	Apartments 5508 Fulcher Ave.	Apartments	46 du	10	3	—	6
5	Apartments 5513 Case Ave.	Apartments	90 du	20	5	—	12
6	Apartments 11112 Burbank Blvd.	Apartments	12 du	3	1	—	2
7	Apartments 11433 Albers St.	Apartments	59 du	13	4	8	—
8	Mixed-Use 5553 N. Tujunga Ave.	Apartments	30 du	7	2	4	—
		Retail	4,970 sf	1	0	1	—
		Office	2,962 sf	2	0	1	—
9	Apartments 11410 W. Burbank Blvd.	Apartments	84 du	19	5	11	—
10	Mixed-Use 5444 N. Vineland Ave.	Self-Storage Space	96,444 sf	1	0	—	0
		Office	10,000 sf	6	2	—	4
11	Fitness Studio 5200 N. Lankershim Blvd.	Health/Fitness Club	2,690 sf	1	0	—	0
12	Condominium 11525 Chandler Blvd.	Condominiums	60 du	14	4	8	—

Table IV.J.3-6 (Continued)
Estimated Student Generation from Related Projects

No. ^a	Project	Description	Size	Students Generated ^b			
				Lankershim Elementary School	Reed Middle School	North Hollywood High School	East Valley High School
13	Apartments 5633 Farmdale Ave.	Apartments	26 du	6	2	3	—
14	Camellia Court Apartments 5610 Camellia Ave.	Apartments	62 du	14	4	8	—
15	Self Storage 5260 N. Vineland Ave.	Self Storage	81,300 sf	1	0	—	0
16	Apartments 5147 Bakman Ave.	Apartments	33 du	7	2	4	—
17	Apartments 5110 N. Bakman Ave.	Apartments	51 du	12	3	7	—
18	Apartments 11246 W. Otsego St.	Apartments	70 du	16	4	9	—
19	NoHo Millennium 5107 Lankershim Blvd.	Apartments	287 du	65	18	37	—
		Market	23,733 sf	5	1	3	—
		Office	1,267 sf	1	0	0	—
20	Apartments 11106 Hartsook St.	Apartments	61 du	14	4	—	8
21	Apartments 11029–11035 Hartsook St.	Apartments	53 du	12	3	—	7
22	Apartments 5050 N. Bakman Ave.	Apartments	40 du	9	2	5	—
23	Mixed-Use 10821 Magnolia Blvd.	Retail	4,075 sf	1	0	—	0
		Apartments	40 du	9	2	—	5
24	School 11600 Magnolia Blvd.	Additional Students ^c	78 stu	—	0	0	—
25	Apartments 5755 N. Tujunga Ave.	Apartments	33 du	—	—	4	—

Table IV.J.3-6 (Continued)
Estimated Student Generation from Related Projects

No. ^a	Project	Description	Size	Students Generated ^b			
				Lankershim Elementary School	Reed Middle School	North Hollywood High School	East Valley High School
26	Apartments 11155 W. Huston St.	Apartments	24 du	5	1	3	—
27	Wesley School 4832 Tujunga Ave.	Additional Students ^c	91 stu	0	0	0	—
28	Apartments 11443 Riverside Dr.	Apartments	29 du	—	2	4	—
29	Mixed-Use 11311 Camarillo St.	Apartments	60 du	14	4	8	—
		Retail	3,000 sf	1	0	0	—
30	Apartments 10804 W. Blix St.	Apartments	21 du	—	1	—	3
31	Mixed-Use 10850 Riverside Dr.	Apartments	179 du	—	11	23	—
		Retail	5,694 sf	—	0	1	—
32	Cohen Apartment 10601 Riverside Dr.	Apartments	82 du	—	5	—	11
		Retail	13,327 sf	—	1	—	1
33	Apartments 11036 Moorpark St.	Apartments	96 du	—	6	12	—
34	Gas Station 4377 Vineland Ave.	Expansion of Existing Facilities	1,818 sf	—	0	0	—
Total Related				411	137	183	111
Project				746	201	425	425
Total Related + Project				1,157	338	608	536
<p><i>du = dwelling units</i> <i>sf = square feet</i> <i>stu = students</i> <i>— = The related project is not located within the attendance boundary of that school. Therefore, student generation was not calculated.</i></p>							

Table IV.J.3-6 (Continued)
Estimated Student Generation from Related Projects

No. ^a	Project	Description	Size	Students Generated ^b			
				Lankershim Elementary School	Reed Middle School	North Hollywood High School	East Valley High School
<i>Totals calculated have been rounded to the nearest whole number and may not sum due to rounding.</i>							
<i>^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.</i>							
<i>^b Based on student generation factors provided in the LAUSD Developer Fee Justification Study, March 2020. For the residential component, the following student generation rates were used: 0.2269 student per household (grades K–6), 0.0611 student per household (grades 7–8), and 0.1296 student per household (grades 9–12). For non-residential uses, the following student generation rates were used: 0.001128 student per square foot for Standard Commercial Office; 0.000360 student per square foot for Community Shopping Centers; and 0.000014 student per square foot for Rental Self Storage 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).</i>							
<i>^c 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.</i>							
Source: Eyestone Environmental, 2022.							

**Table IV.J.3-7
Cumulative Student Capacity**

School Name	Existing (2019) Overage/ Shortage	With Project + Related Projects 2019	Projected (2024) Overage/ Shortage	With Project + Related Projects 2024
Lankershim Elementary	(93)	(1,250)	(54)	(1,211)
Walter Reed Middle School	225	(113)	299	(39)
North Hollywood Senior High	(211)	(819)	(249)	(857)
East Valley Senior High	(132)	(668)	(66)	(602)
<hr/> () = negative number Source: Eyestone Environmental, 2022.				

With regard to projected future capacity as shown in Table IV.J.3-7, with the addition of students generated by the Project in combination with the related projects, Lankershim Elementary School would have a seating shortage of 1,211 students (i.e., future seating shortage of 54 students in addition to the Project plus related projects student generation of 1,157 students), Walter Reed Middle School would have a seating shortage of 39 students (i.e., future seating overage of 299 students minus the Project plus related projects student generation of 338 students), North Hollywood Senior High would have a seating shortage of 857 students (i.e., future seating shortage of 249 students in addition to the Project plus related projects student generation of 608 students), and East Valley High would have a seating shortage of 602 students (i.e., future seating shortage of 66 students in addition to the Project plus related projects student generation of 536 students). As such, the students generated by the Project in combination with the related projects located within the school attendance boundaries would cause a shortage when compared to existing conditions and projected school capacity at Lankershim Elementary School, Walter Reed Middle School, North Hollywood Senior High and East Valley Senior High.

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

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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