

IV. Environmental Impact Analysis

J.3 Public Services—Schools

1. Introduction

This section of the Recirculated Draft EIR provides an analysis of the Project’s potential impacts on public school facilities that would serve the Project Site. Public schools in the City of Los Angeles are under the jurisdiction of the Los Angeles Unified School District (LAUSD). This section evaluates whether new or physically altered public school facilities serving the Project Site 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 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 presented in this section is based, in part, on written correspondence provided by LAUSD dated January 22, 2021, which is included in Appendix I of this Recirculated 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 (Cal. Educ. Code Sections 48350, et seq.)
- Class Size Reduction Kindergarten-University Public Education Facilities Bond Act of 1998;
- LAUSD Strategic Plan 2022–2026;
- City of Los Angeles General Plan, including:

- Framework Element; and
- 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), 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

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

² *State of California, Office of Public School Construction, School Facility Program Handbook, January 2019.*

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 Sections 65996 and 65997, legislative acts, adjudicative acts, or the payment of fees by a developer serve to mitigate all potential impacts on 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 (Ed. Code, Sections 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 indicated 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 Sections 65996 and 65997.

⁴ California Education Code Sections 48350, et seq..

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

(b) LAUSD Strategic Plan 2022–2026

The LAUSD Strategic Plan 2022–2026 (Strategic Plan) represents the LAUSD’s framework towards a commitment to ensure that all students graduate. To achieve this goal, the Strategic Plan has been designed to inform actions that can be taken in schools, district office, and communities throughout the City of Los Angeles to drive student success. The Strategic Plan identified four key goals outlining student outcomes for the year 2026: (1) Postsecondary Preparedness, (2) Literacy, (3) Numeracy, and (4) Social-Emotional Wellness. Furthermore, the Strategic Plan provides key initiatives to achieve these commitments from which implementation plans were proposed to 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.

(c) LAUSD Choices Program

LAUSD provides education choices including magnet and permits with transportation (PWT) 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

(a) Los Angeles General Plan Framework Element

(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, 2020.*

⁶ *LAUSD, e-Choices LAUSD Choices Program, <https://echoices.lausd.net/Magnet/#gsc.tab=0>, accessed July 6, 2023.*

**Table IV.J.3-1
Relevant General Plan School Goals, Objectives, and Policies**

Goals Objectives and Policies	
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 9.32.2	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/> <p><i>Source: City of Los Angeles, 2001.</i></p>	

(b) 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 City's General Plan Framework 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. In addition, while the Palms–Mar Vista–Del Rey Community Plan includes policies related to schools, such policies are directed toward the City and not to private development projects.

b. Existing Conditions

(1) Los Angeles Unified School District

The LAUSD serves an area of approximately 710 square miles that includes the City of Los Angeles, all or portions of 25 additional cities, and several unincorporated areas of Los Angeles County.⁷ During the current 2022–2023 school year, LAUSD is providing kindergarten through high school (Grades K–12) education to approximately 571,002 students enrolled throughout 1,438 schools and centers. These include 18 primary school centers, 435 elementary schools, 77 middle schools, 86 senior high schools, 59 option schools, 67 magnet schools, 30 multi-level schools, 12 special education schools, two home/hospital centers, 265 magnet centers on regular campuses (Grades K–12), 224 charter schools, and 164 other schools and centers.⁸ The LAUSD is divided into six local districts, and the Project Site is located in the West Local District, as shown in Figure IV.J.3-1 on page IV.J.3-7.⁹

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. Proposition 1D, which was approved by voters in November 2006, provides \$10.4 billion in general obligation bonds for educational facilities, of which \$7.3 billion is earmarked for grades K–12 projects.¹⁰ As of April 2023, the LAUSD has received priority funding apportionments by the State Department of General Services—Office of Public School Construction from Propositions 1D and 51.¹¹ As of June 2021, the LAUSD also continues to participate in requests for priority funding.¹²

⁷ LAUSD, *Fingertip Facts 2022–2023*.

⁸ LAUSD, *Fingertip Facts 2022–2023*.

⁹ LAUSD, *Local District Map*, <http://achieve.lausd.net/domain/34>, accessed June 8, 2023.

¹⁰ *California's Nonpartisan Fiscal and Policy Advisor, Proposition 1D: Kindergarten-University Public Education Facilities Bond Act of 2006*, https://lao.ca.gov/ballot/2006/1d_11_2006.htm, accessed July 6, 2023.

¹¹ *State of California, Department of General Services, Office of Public School Construction, School Facility Program, Projects Receiving Priority Funding Apportionments, State Allocation Board Meeting, April 26, 2023*.

¹² *State of California, Department of General Services, Office of Public School Construction, Priority Funding Request Acceptance List as of June 2021*.

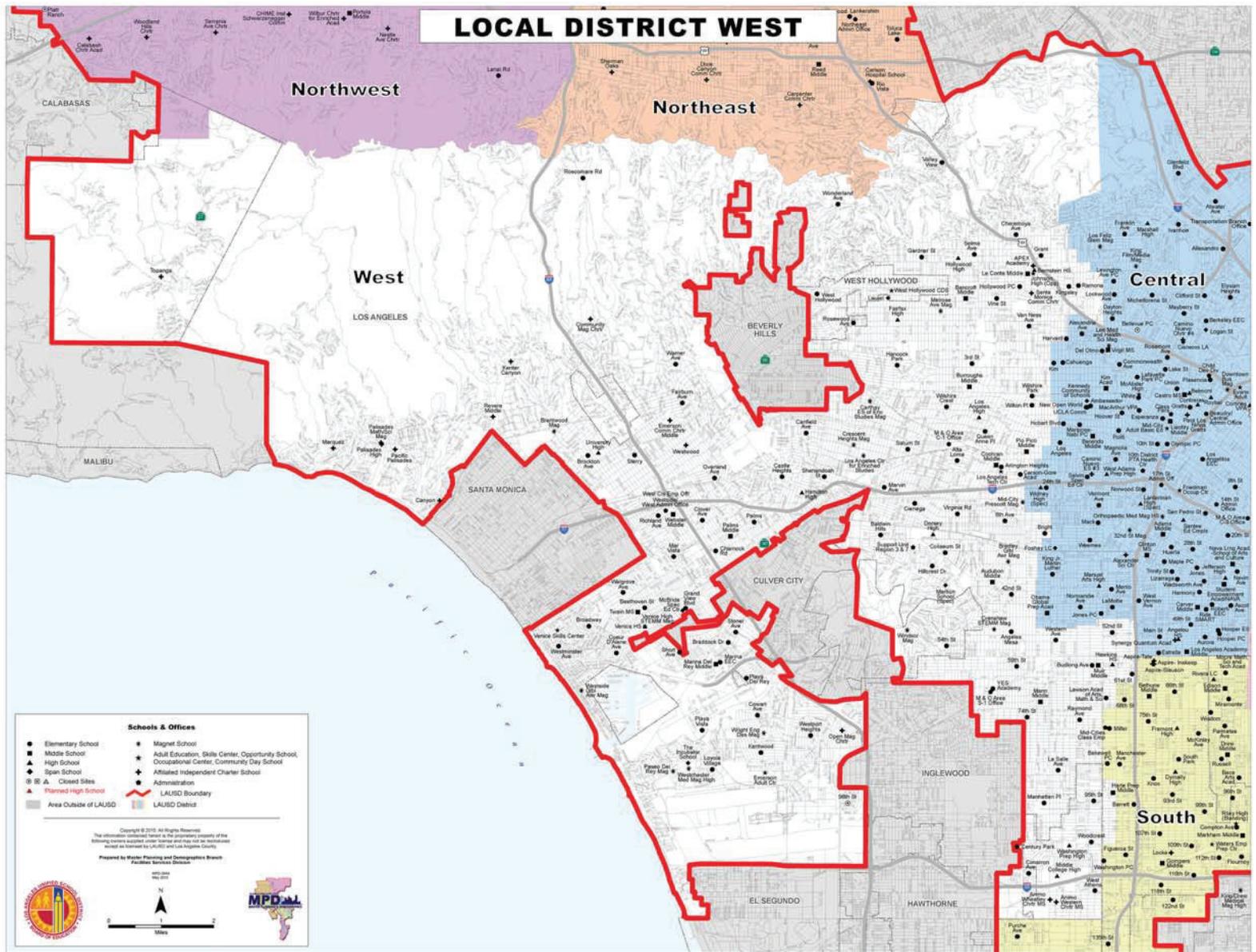


Figure IV.J.3-1
Los Angeles Unified School District Local District—West Boundary Map

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 171,000 new classroom seats, completed over 19,000 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.¹³

(a) Public Schools

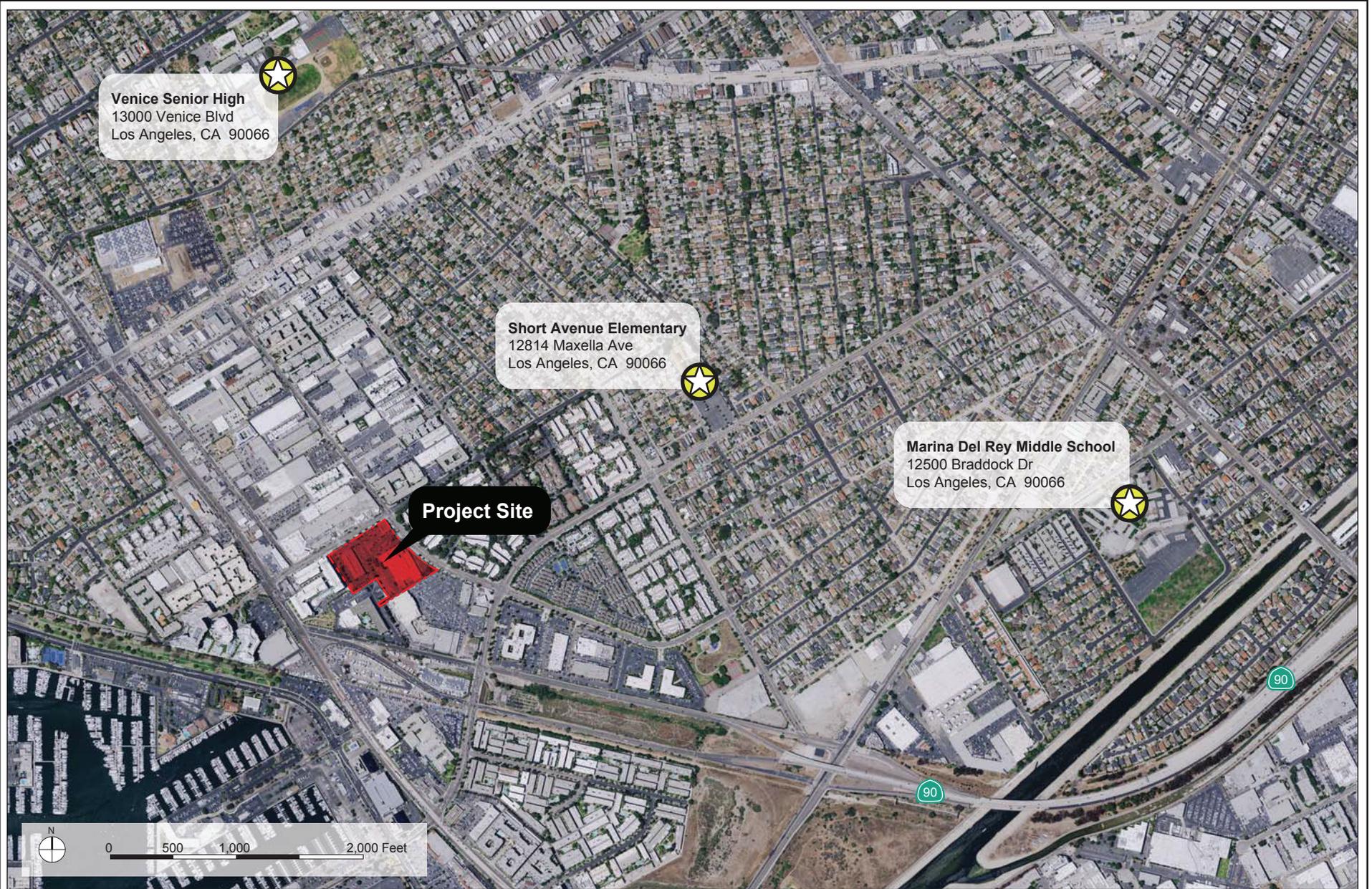
As shown in Figure IV.J.3-2 on page IV.J.3-9, the public schools serving the Project Site are Short Avenue Elementary, Marina Del Rey Middle School, and Venice Senior High.¹⁴ These schools currently operate under a single-track calendar in which instruction generally begins in early September and continues through late June. Table IV.J.3-2 on page IV.J.3-10 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 are 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.¹⁵ 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, 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. The LAUSD considers a school to be overcrowded if any one of the following occurs: (1) it currently operates on a multi-track

¹³ LAUSD Facilities Services Division, *Facilities Services Division Strategic Execution Plan 2019*.

¹⁴ LAUSD, *Resident School Identifier*, <https://rsi.lausd.net/ResidentSchoolIdentifier/>, accessed July 6, 2023.

¹⁵ Letter from Vincent Maffei, Director, LAUSD, Facilities Services Division, dated January 22, 2021. See Appendix I of this Recirculated Draft EIR.



Venice Senior High
13000 Venice Blvd
Los Angeles, CA 90066

Short Avenue Elementary
12814 Maxella Ave
Los Angeles, CA 90066

Marina Del Rey Middle School
12500 Braddock Dr
Los Angeles, CA 90066

Project Site

Figure IV.J.3-2
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^e
Short Avenue Elementary	358	417	328	(59)	Yes
Marina Del Rey Middle School	689	947	525	(258)	Yes
Venice Senior High	2,312	3,006	2,026	(694)	Yes

^a School's current operating capacity, or the maximum number of students the school can serve while operating on its current calendar. Excludes capacity used by charter co-locations. Includes capacity for magnet program.

^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 the school operates on a multi-track calendar, there is a seating shortage, or there is a seating overage of less than or equal to a "safety margin" of 20 seats.

Source: Letter from Vincent Maffei, Director, LAUSD, Facilities Services Division, dated January 22, 2021. See Appendix I of this Recirculated Draft EIR.

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.¹⁶ Table IV.J.3-3 on page IV.J.3-11 shows the LAUSD's projected capacity at each of the schools serving the Project Site and vicinity, which are further discussed below.

(i) Short Avenue Elementary

Short Avenue Elementary is located at 12814 Maxella Avenue, approximately 0.6 miles northeast of the Project Site, and offers instruction for grades K–6 on a single-track calendar. During the 2019–2020 academic year, Short Avenue Elementary had a total capacity for 358 students, a residential enrollment of 417 students, and an actual

¹⁶ As described in Section II, Project Description, of this Recirculated Draft EIR, Project construction is anticipated to be completed in 2027. 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^d
Short Avenue Elementary	358	456	(98)	Yes
Marina Del Rey Middle School	689	920	(231)	Yes
Venice Senior High	2,312	3,109	(797)	Yes

^a Schools planning capacity. Excludes capacity used by charter co-locations. Includes capacity for magnet program.

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

^c Per the LAUSD, projected seating overage/(shortage) is projected capacity minus projected resident enrollment.

^d The school is projected to be overcrowded or without available capacity if any of these conditions exist: the school remains on a multi-track calendar, there will be a capacity shortage, or there will be a capacity overage of less than or equal to a "safety margin" of 20 seats.

Source: Letter from Vincent Maffei, Director, LAUSD, Facilities Services Division, dated January 22, 2021. See Appendix I of this Recirculated Draft EIR.

enrollment of 328 students. Therefore, since the school's capacity of 358 students is less than the residential enrollment of 417 students, Short Avenue Elementary is considered overcrowded under existing conditions.

LAUSD's five-year projection for Short Avenue Elementary indicates that the school is projected to have the same capacity as under existing conditions of 358 students and a projected resident enrollment of 456 students, resulting in a projected seating shortage of 98 seats. Therefore, Short Avenue Elementary is projected to experience overcrowding in the future.

(ii) Marina Del Rey Middle School

Marina Del Rey Middle School is located at 12500 Braddock Drive, approximately 1.4 miles east of the Project Site, and offers instruction for grades 6–8 on a single-track calendar. During the 2019–2020 academic year, Marina Del Rey Middle School had a total capacity for 689 students, a residential enrollment of 947 students, and an actual enrollment of 525 students. Therefore, since the school's available capacity of 689 students is less than the residential enrollment of 947 students, Marina Del Rey Middle School is considered overcrowded under existing conditions.

LAUSD’s five-year projection for Marina Del Rey Middle School indicates that the school is projected to have a capacity for 689 students and a projected residential enrollment of 920 students, resulting in a projected seating shortage of 231 seats. Therefore, Marina Del Rey Middle School is projected to experience overcrowding in the future.

(iii) Venice Senior High

Venice Senior High is located at 13000 Venice Boulevard, approximately 1.2 miles north of the Project Site, and offers instruction for grades 9–12 on a single-track calendar. During the 2019–2020 academic year, Venice Senior High had a total capacity for 2,312 students, a resident enrollment of 3,006 students, and an actual enrollment of 2,026 students. Therefore, since the school’s available capacity of 2,312 students is less than the residential enrollment of 3,006 students, Venice Senior High is considered overcrowded under existing conditions.

LAUSD’s five-year projection for Venice Senior High indicates that the school is projected to have a capacity for 2,312 students and a projected residential enrollment of 3,109 students, resulting in a projected seating shortage of 797 seats. Therefore, Venice 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.¹⁷ LAUSD has over 275 independent and affiliated charter schools within its jurisdiction, serving over 150,000 students in grades kindergarten through 12th grade.¹⁸ The charter schools in the vicinity of the Project Site include Animo Venice Charter High School, Ocean Charter School, Goethe International Charter School of LA, and ICEF Vista

¹⁷ LAUSD, *Charter Schools Division, About Charter Schools*: <https://achieve.lausd.net/Page/1816>, accessed June 27, 2023.

¹⁸ LAUSD, *Charter Schools Division, About Charter Schools*: <https://achieve.lausd.net/Page/1816>, accessed June 27, 2023.

Middle Charter Academy.¹⁹ 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.²⁰

(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 333 magnet programs located within the LAUSD.²¹ Magnet programs are offered at the following schools in the vicinity of the Project Site: Science, Technology, Engineering, Mathematics and Medicine Magnet at Venice Senior High School; Mark Twain Middle School World Languages Magnet; World Languages and Global Studies Magnet at Venice Senior High School; Performing Arts Magnet at Marina Del Rey Middle School; and Westside Global Awareness Magnet.²² Since 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.²³ 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

¹⁹ *California Charter Schools Association (CCSA), www.ccsa.org/find-a-school?lat=33.9860917&lng=-118.4411814&search=13450%20Maxella%20Ave,%20Marina%20Del%20Rey,%20CA%2090292,%20USA, accessed July 6, 2023.*

²⁰ *Letter from Rena Perez, Director of Master Planning and Demographics, LAUSD Facilities Services Division, dated July 14, 2017. See Appendix I of this Recirculated Draft EIR.*

²¹ *LAUSD, Student Integrated Services, e-choices, Magnet Program, <https://echoices.lausd.net/magnet#gsc.tab=0>, accessed June 8, 2023.*

²² *LAUSD, Enrollment, School Finder Tool, <https://explorelausd.schoolmint.net/school-finder/home>, accessed July 6, 2023.*

²³ *LAUSD, Pilot Schools, <https://achieve.lausd.net/pilotschools>, accessed June 27, 2023.*

LAUSD Local District 4 with a specific focus on creating new, innovative schools to relieve overcrowding at Belmont High School.²⁴ Currently, there are 40 pilot schools located within the LAUSD.²⁵

(e) Proposed New Public Schools

LAUSD Facilities Services Division is managing a \$25.6 billion program to build new schools to reduce overcrowding and modernize existing campuses throughout LAUSD's service area. To date, more than 800 new projects providing more than 171,000 new seats have been constructed, and more than 19,000 school modernization projects have completed construction to provide upgraded facilities.²⁶ According to the LAUSD, there are no new proposed public schools planned to be built in the vicinity of the Project Site.²⁷

(f) Open Enrollment Policy

The open enrollment policy is a state-mandated policy that enables students anywhere in the LAUSD to apply to any regular, grade-appropriate Los Angeles public school with designated open enrollment seats.²⁸ 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.

(2) Private Schools in the Project Vicinity

In addition to publicly available schools, there are also a number of private schools in the Project Site vicinity that could potentially serve as alternatives to LAUSD schools. Specifically, there are two private schools, ranging from kindergarten through 12th grade, within 1 mile of the Project Site's street address.²⁹ Private school facilities generally have smaller student populations and higher teacher to student ratios than their public counterparts. This information is presented for factual purposes only, as it does not directly

²⁴ LAUSD, *History of Pilot Schools*, <https://achieve.lausd.net/Page/18155>, accessed July 6, 2023.

²⁵ LAUSD, *History of Pilot Schools*, <https://achieve.lausd.net/Page/18155>, accessed July 6, 2023.

²⁶ LAUSD Facilities Services Division, *Facilities Services Division Strategic Execution Plan 2019*.

²⁷ Letter from Vincent Maffei, Director of Master Planning and Demographics, LAUSD Facilities Services Division, dated January 22, 2021. See Appendix I of this Recirculated Draft EIR.

²⁸ LAUSD, *K–12 Open Enrollment*, <https://achieve.lausd.net/K12OpenEnrollment>, accessed June 27, 2023.

²⁹ *Private School Review, Private Schools within 1 mile of 13400 Maxella Ave*, www.privateschoolreview.com/find-schools-by-location/13450%20maxella%20ave%2C%20marina%20del%20rey%2C%20ca%2090292-original-address-13450%20maxella/33.9861939/-118.4404859/1/none/0/0/0/none/none/0/0, accessed July 6, 2023.

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, response times 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 rates from the 2020 LAUSD Developer Fee Justification Study.³⁰

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.³¹

c. Project Design Features

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

d. Analysis of Project Impacts

As set forth in Section II, Project Description, of this Recirculated Draft EIR, the Project proposes two development options—Option A and Option B. Under Option A, the Project proposes the development of 658 multi-family residential units and 27,300 square feet of neighborhood-serving commercial uses, including approximately 13,650 square feet of retail space and approximately 13,650 square feet of restaurant space. Option B proposes the development of 425 multi-family residential units, 90,000 square feet of office space, and 40,000 square feet of neighborhood-serving commercial uses, including approximately 20,000 square feet of retail space and approximately 20,000 square feet of restaurant space. Both development options are evaluated in the following analysis.

³⁰ *Los Angeles Unified School District, 2020 Developer Fee Justification Study, March 2020.*

³¹ *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.*

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, response times or other performance objectives for school services?

(1) Impact Analysis

(a) Construction

The Project would involve the development of multi-family residential units 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. **Impacts on school facilities during Project construction would be less than significant.**

(b) Operation

As noted above, Option A would include development of new residential units and neighborhood-serving commercial space while Option B would include the development of residential units, office space, and commercial space. As shown in Table IV.J.3-4 on page IV.J.3-18, using the applicable LAUSD student generation rates for the Project's land uses, Option A would generate approximately 291 new students consisting of 158 elementary school students, 43 middle school students, and 90 high school students. As discussed in Section II, Project Description, of this Recirculated Draft EIR, the Project includes removal of three existing shopping center-related buildings that together comprise approximately 100,781 square feet of floor area. As shown in Table IV.J.3-4, using the applicable LAUSD student generation rates, the existing commercial buildings generate approximately 64 students, consisting of 35 elementary school students, 9 middle school students, and 20 high school students. When accounting for the removal of the existing on-site commercial uses, Option A would result in a net increase of 227 students consisting of 123 elementary school students, 34 middle school students, and 70 high school students.

**Table IV.J.3-4
Estimated Number of Students Generated by the Project—Option A**

Land Use	Number of Units	Students Generated ^{a,b}		
		Elementary (K–6)	Middle School (7–8)	High School (9–12)
Multi-Family Residential Units	658 du	150	41	86
Commercial (Retail/Restaurant)	27,300 sf	10	3	6
Total Students Generated		160	44	92
<i>Existing Commercial to be removed</i>	<i>100,781 sf</i>	35	9	20
Net New Student Generation		125	35	72

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 0.638 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 Numbers may not add up exactly due to rounding.

Source: Eyestone Environmental, 2023.

As shown in Table IV.J.3-5 on page IV.J.3-19, using the applicable LAUSD student generation rates for the Project’s land uses, Option B would generate approximately 305 new students consisting of 165 elementary school students, 45 middle school students, and 95 high school students. When accounting for the removal of the existing on-site commercial uses, Option B would result in a net increase of 241 students consisting of 130 elementary school students, 36 middle school students, and 75 high school students.

It should be noted that the number of Project-generated students who could attend LAUSD schools serving the Project Site would likely be less than the above estimate because this analysis does not include LAUSD options that would allow students generated by the Project to enroll at other LAUSD schools located away from their home attendance area, or students who may enroll in private schools or participate in home-schooling. In addition, this analysis does not account for Project residents who may already reside in the

**Table IV.J.3-5
Estimated Number of Students Generated by the Project—Option B**

Land Use	Number of Units	Students Generated ^{a,b}		
		Elementary (K–6)	Middle School (7–8)	High School (9–12)
Multi-Family Residential Units	425 du	97	26	56
Commercial (Retail/Restaurant)	40,000 sf	14	4	8
Office	90,000 sf	56	15	32
Total Students Generated		167	45	96
<i>Existing Commercial to be removed</i>	<i>100,781 sf</i>	35	9	20
Net New Student Generation		132	36	76

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 0.638 student per 1,000 square feet for “Neighborhood Shopping Center” 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. 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.

Source: Eyestone Environmental, 2023.

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 Science, Technology, Engineering, Mathematics and Medicine Magnet at Venice Senior High School, World Languages and Global Studies Magnet at Venice Senior High School, Performing Arts Magnet at Marina Del Rey Middle School, and Westside Global Awareness Magnet), 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.³² 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, Short Avenue Elementary, Marina Del Rey Middle School, and Venice Senior High would not have adequate capacity to accommodate the new students generated by either Option A or Option B under existing conditions. Specifically, with the addition of Project-generated students under Option A, Short Avenue Elementary School would have a seating shortage of 219 students (i.e., existing seating shortage of 59 students in addition to the Option A student generation of 160 students), Marina Del Rey Middle School would have a seating shortage of 302 students (i.e., existing seating shortage of 258 students in addition to the Option A student generation of 44 students), and Venice Senior High would have a seating shortage of 786 students (i.e., existing seating shortage of 694 students in addition to the Option A student generation of 92 students). With the addition of Project-generated students under Option B, Short Avenue Elementary School would have a seating shortage of 226 students (i.e., existing seating shortage of 59 students in addition to the Option B student generation of 167 students), Marina Del Rey Middle School would have a seating shortage of 303 students (i.e., existing seating shortage of 258 students in addition to the Option B student generation of 45 students), and Venice Senior High would have a seating shortage of 790 students (i.e., existing seating shortage of 694 students in addition to the Option B student generation of 96 students).

With regard to projected future capacity during the 2024–2025 academic year, under Option A, Short Avenue Elementary School would have a seating shortage of 258 students (i.e., future seating shortage of 98 students in addition to the Option A student generation of 160 students), Marina Del Rey Middle School would have a seating shortage of

³² A feeder pattern is the linkage from elementary school, middle school, and high school.

275 students (i.e., future seating shortage of 231 students in addition to the Option A student generation of 44 students), and Venice Senior High would have a seating shortage of 889 students (i.e., future seating shortage of 797 students in addition to the Project student generation of 92 students). Under Option B, Short Avenue Elementary School would have a seating shortage of 265 students (i.e., future seating shortage of 98 students in addition to the Option B student generation of 167 students), Marina Del Rey Middle School would have a seating shortage of 276 students (i.e., future seating shortage of 231 students in addition to the Option B student generation of 45 students), and Venice Senior High would have a seating shortage of 893 students (i.e., future seating shortage of 797 students in addition to the Project student generation of 76 students).

Pursuant to SB 50, the Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of the Project's building 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 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 Recirculated Draft EIR, there are 14 related projects located in the Project Site vicinity, including nine related projects located within the City of Los Angeles, four related projects located within Culver City, and one related project located within the County of Los Angeles. While not all 14 projects may fall within the attendance boundaries of the schools serving the Project Site, these 14 related projects are considered in this cumulative analysis.

As shown in Table IV.J.3-6 on page IV.J.3-23, the 14 related projects could potentially generate 214 Short Avenue Elementary School students, 79 Marina Del Rey Middle School students, and 174 Venice Senior High students, based on the rates provided in the 2020 LAUSD Developer Fee Justification Study. As indicated above, Option A would generate approximately 290 new students consisting of 160 elementary school students, 44 middle school students, and 86 high school students. Option B would generate approximately 308 new students consisting of 167 elementary school students, 45 middle school students, and 96 high school students. Option A in combination with the related projects would have the potential to generate a cumulative total of 374 Short Avenue Elementary School students, 123 Marina Del Rey Middle School students, and 260 Venice Senior High students. Option B in combination with the related projects would have the potential to generate a cumulative total of 381 Short Avenue Elementary School students, 124 Marina Del Rey Middle School students, and 270 Venice 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, with the addition of students generated by Option A in combination with the related projects, Short Avenue Elementary School would have a seating shortage of 433 students (i.e., existing seating shortage of 59 students in addition to the Option A plus related projects student generation of 374 students), Marina Del Rey Middle School would have a seating shortage of 381 students (i.e., existing seating shortage of 258 students in addition to the Option A plus related projects student generation of 123 students), and Venice Senior High would have a seating shortage of 954 students (i.e., existing seating shortage for 694 students in addition to the Option A plus related projects student generation of 260 students). With the addition of students generated by Option B in combination with the related projects, Short Avenue Elementary School would have a seating shortage of 440 students (i.e., existing seating shortage of 59 students in addition to the Option B plus related projects student generation of 381 students), Marina Del Rey Middle School would have a seating shortage of 382 students (i.e., existing seating shortage of 258 students in addition to the Option B plus related projects student generation of 124 students), and Venice Senior High would have a seating shortage of 964 students (i.e., existing seating shortage for 694 students in addition to the Option B plus related projects student generation of 270 students).

With regard to projected future capacity, with the addition of students generated by Option A in combination with the related projects, Short Avenue Elementary School would have a seating shortage of 472 students (i.e., future seating shortage of 98 students in addition to the Option A plus related projects student generation of 374 students), Marina Del Rey Middle School would have a seating shortage of 354 students (i.e., future seating shortage of 231 students in addition to the Option A plus related projects student generation of 123 students), and Venice Senior High would have a seating shortage of 1,057 students (i.e., future seating shortage of 797 students in addition to the Option A plus

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

No.	Project	Description	Size	Students Generated ^{a,b}		
				Short Ave. Elementary	Marina del Rey Middle School	Venice High School
1	X67 Lofts 4140 S. Glencoe Ave.	Apartments	67 du	16	5	9
		Office	3,211 sf	1	1	2
2	C1 by CLG 4210 S. Del Rey Ave.	Condominiums	136 du	31	8	18
		Office	14,929 sf	4	3	6
3	R3 by CLG 4091 S. Redwood Ave.	Condominiums	67 du	16	5	9
		Office	7,525 sf	2	2	3
4	G8 by CLG 4040 S. Del Rey Ave.	Apartments	230 du	53	15	30
		Office	18,800 sf	5	4	7
5	INclave 4065–71 Glencoe Ave.	Creative Office	35,206 sf	10	6	13
		Specialty Retail	1,500 sf	1	1	1
		Apartments	49 du	12	3	7
6	Warehouse to Office 4721 S. Alla Road	Office	118,352 sf	31	20	42
7	Stella Phase 2 13488 W. Maxella Ave.	Apartments	65 du	15	4	9
8	Thatcher Yard 3233 S. Thatcher Avenue	Affordable Senior Housing	68 du	16	5	9
		Affordable Family Housing	30 du	7	2	4
9	Cedars-Sinai Marina del Rey Replacement Hospital 4650 Lincoln Boulevard	Hospital	160 beds	N/A	N/A	N/A
		Hospital	(133 beds)	N/A	N/A	N/A
		Medical Office	(50,500 sf)	(28)	(8)	(16)
10	Costco Expansion 13463 Washington Boulevard	Discount Club	31,023 sf	5	3	7
		Fueling Station	2 pumps	0	0	0
		Supermarket	(63,213 sf)	(10)	(6)	(13)
11	Baldwin Site	Apartments	37 du	9	3	5

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

No.	Project	Description	Size	Students Generated ^{a,b}		
				Short Ave. Elementary	Marina del Rey Middle School	Venice High School
	12803 Washington Boulevard	Retail	7,206 sf	1	1	1
12	Kayvon Mixed-Use 12712-12718 Washington Boulevard	Residential	5 du	1	1	1
		Retail	3,414 sf	1	1	1
		Retail	(2,340 sf)	(1)	(1)	(1)
13	Townhome Development 4118 Wade Street	Townhomes	4 du	1	1	1
14	Pier 44 4625 & 4635 Admiralty Way	Commercial	91,760 sf	14	9	19
		Marina	141 berths	0	0	0
Total Related				214	79	174
Project (Option A)				160	44	86
Total Related + Option A				374	123	260
Project (Option B)				167	45	96
Total Related + Option B				381	124	270
<p><i>du = dwelling units</i> <i>sf = square feet</i> <i>() = removal/minus number</i> <i>N/A = No generation rate available</i></p> <p>^a For residential uses, the following student generation rates were used: 0.2269 student per household (grades K–6), 0.0611 student per household (grades 7–8), and 0.1296 student per household (grades 9–12). Since the 2020 LAUSD Developer Fee Justification Study does not specify which grade levels students fall within for non-residential land uses, the students generated by non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 54 percent elementary school, 15 percent middle school, and 31 percent high school).</p> <p>^b The 2020 LAUSD Developer Fee Justification Study does not provide a student generation factor for hospitals or hospital beds.</p> <p>Source: Eyestone Environmental, 2023.</p>						

related projects student generation of 260 students). With the addition of students generated by Option B in combination with the related projects, Short Avenue Elementary School would have a seating shortage of 479 students (i.e., future seating shortage of 98 students in addition to the Option B plus related projects student generation of 381 students), Marina Del Rey Middle School would have a seating shortage of 355 students (i.e., future seating shortage of 231 students in addition to the Option B plus related projects student generation of 124 students), and Venice Senior High would have a seating shortage of 1,067 students (i.e., future seating shortage of 797 students in addition to the Option B plus related projects student generation of 270 students). As such, the students generated by the Project under either Option A or Option B 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 Short Avenue Elementary School, Marina Del Rey Middle School, and Venice Senior High.

This degree of cumulative growth would increase the demand for LAUSD services in the Project Site vicinity. However, the Project would comprise only a fraction of the total estimated cumulative growth in students in the vicinity of the Project Site. Furthermore, as with the Project, future development, including the related projects, would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits pursuant to SB 50. Pursuant to Government Code Section 65995, the payment of these fees would be considered full and complete mitigation of school impacts generated by the related projects. **Therefore, 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 or included, and the impact level remains less than significant.