IV. Environmental Impact Analysis

L.3 Public Services – Schools

1. Introduction

This section describes the existing schools that service the Project Site and vicinity, identifies associated regulatory requirements, and evaluates the potential impacts related to implementation of the proposed Project. Specifically, this section analyzes the potential impacts of the Project relative to public schools that 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 includes information based on written correspondence from LAUSD, which is included as Appendix K-3 of this Draft Environmental Impact Report (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 and Proposition 1A
- Open Enrollment Policy
- LAUSD
  - Strategic Plan 2016–2019
  - New School Construction Program
- Los Angeles General Plan
  - Framework Element
  - Community Plan

(1) Federal

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

(2) State

(a) California Education Code

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

(b) Senate Bill 50 and Proposition 1A

Senate Bill (SB) 50, the Leroy F. Greene School Facilities Act of 1998, was signed into law on August 27, 1998. It placed a $9.2 billion State bond measure (Proposition 1A), which included grants for modernization of existing schools and construction of new schools, on the ballot for the November 3, 1998, election. Proposition 1A, the Class Size Reduction Kindergarten-University Public Education Facilities Bond Act of 1998[1] is a school construction funding measure. This Act created the School Facility Program where eligible school districts may obtain state bond funds. Proposition 1A was approved by voters, thereby enabling SB 50 to become fully operative. Under SB 50, a program for funding school facilities largely based on matching funds was created. Its construction grant provides funding on a 50/50 state and local match basis, while its modernization grant provides funding on a 60/40 basis. Districts unable to provide some, or all, of the local match requirement may meet financial hardship provisions and are potentially eligible for additional State funding.

[1] Education Code, Sections 100400–100405.

In addition, SB 50 allows governing boards of school districts to establish fees to offset costs associated with school facilities made necessary by new construction. Pursuant to SB 50, LAUSD collected development fees for new construction within its district boundaries. Currently, LAUSD collects the maximum new school construction facility fee at a rate of $3.36 per square foot of new residential construction, $0.54 per square foot of commercial/industrial construction, $0.28 per square foot of storage-structure, and $0.09 per square foot of parking structure. Payment of these fees is required prior to issuance of building permits. Pursuant to California Government Code Sections 65995 and 65996, the payment of these fees by a developer serves to fully mitigate all potential project impacts on school facilities from implementation of a project to less-than-significant levels.

(c) Open Enrollment Policy

The Open Enrollment Policy[2] 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.[3]

(3) Regional Level

(a) *LAUSD*

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 SB 50, LAUSD collects developer fees for new construction within its boundaries. The LAUSD School Facilities Needs Analysis has been prepared to support the district's levy of the fees authorized by Section 17620 of the California Education Code. Payment of these fees would be mandatory for Kaiser Permanente and would fully mitigate any impact upon school services generated by the Project.[4]

2 California Education Code Section 48350, et seq.
3 Los Angeles Unified School District (LAUSD), K–12 Open Enrollment, 2020.
4 LAUSD, 2018 Developer Fee Justification Study Los Angeles School District, March 2018.

(i) 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; and (5) School Safety. Further, 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. 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 permits with transportation 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.[5]

(ii) New School Construction Program

In 1998, LAUSD began an aggressive, multi-phased, multi-billion-dollar program—the New School Construction Program—to deliver new school facilities to relieve critical student overcrowding throughout the district. Under the New School Construction Program, LAUSD identifies target areas of need, acquires necessary sites, designs and develops school plans, and constructs schools as quickly as possible. The goal of the program is to operate all schools on a two-semester, 180-day school calendar.

[5] LAUSD, e-Choices LAUSD Choices Program, http://echoices.lausd.net//GeneralInformation.aspx, accessed January 4, 2021.

(4) Local

(a) *Los Angeles General Plan*

(i) Framework Element

Chapter 9, Infrastructure and Public Services of the Framework Element of the City of Los Angeles General Plan (Framework Element)[6] includes the following goals, objectives, and policies applicable to public schools:

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 the 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 the 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.

6 City of Los Angeles, City of Los Angeles General Plan Framework Element, 2001.

(i) 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. The Hollywood Community Plan7 includes the following policies applicable to public schools. It is the City's policy:

1. That the Los Angeles Unified School District's standards and criteria for student travel distance, minimum school size and optimum pupil enrollment be tailored to specific Hollywood area characteristics of land use, street circulation, topography, population densities, number of school age children and availability of vacant land.

2. That the Los Angeles Unified School District be requested to tailor improvements in educational programming, curricula and staffing to the specific social, economic and cultural characteristics of the Community's residents.

3. That all school facilities in the Hollywood Community be constantly reviewed, analyzed and upgraded, in view of the fact that the District contains some of the oldest schools in the City.

4. That due to an absence of vacant land, an after-hours, multi-use concept of school facilities, together with a joint-use concept of other public facilities, be encouraged and promoted.

5. That the expansion of school sites be planned so as to minimize displacement of residents and that, where possible, alternative architectural concepts be developed.

6. That the expansion of school facilities be accommodated on a priority basis and consider the following: existing school size, age of main buildings, current and projected enrollment and projected land uses and population.

[7] City of Los Angeles, Hollywood Community Plan, approved December 13, 1988.

7. That the location of new school facilities be based on population densities, number of school age children, projected population, circulation, and existing and future land uses.

8. That all school facilities adjacent to freeways be buffered against visual, noise and air pollution impacts.

9. That educational opportunities for adults be expanded in the community.

b) Existing Conditions

(1) LAUSD

LAUSD serves an area of approximately 720 square miles that includes the City of Los Angeles, all or portions of 31 other municipalities, and several unincorporated areas of Los Angeles County.[8]

LAUSD's operations are predominantly funded by local property tax revenue that is first accrued in a common Statewide pool together with property tax revenue from throughout the State, then allocated to each school district on the basis of average daily attendance. In addition, State law also permits school districts to charge developer fees to fund capital acquisition and improvements to school facilities, based on documented justification that residential and nonresidential development projects generates students. As previously mentioned, the majority of school funding is appropriated by the State. On a regional level, schools are generally governed by an elected body. LAUSD operates under the policy direction of an elected governing district school board (elected from the local area), as well as by local propositions which directly impact the funding of facility construction and maintenance. Pursuant to SB 50, LAUSD collects developer fees for new construction within its district boundaries.

(2) Enrollment and Capacities

The Project Site is located within a High School attendance choice/option area.[9] According to LAUSD, the calculation of available capacity (seating overage or shortage) is based on the resident enrollment compared to the respective school's capacity. Resident enrollment is defined as the total number of students living in the school's attendance area who are eligible to attend the school, including magnet students. Actual enrollment is defined as the number of students actually attending the school, including magnet students. The goal of the calculation is to determine the number of seats available for students residing within the attendance boundary. LAUSD considers a school as overcrowded if one of the following occurs: (1) the school currently operates on a multi-

8 LAUSD, About the Los Angeles Unified School District, accessed January 4, 2021.
9 Appendix K-3, LAUSD Response.

track 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 30 seats (e.g., if the available capacity is 30 seats or fewer). **Table IV.L.3-1** presents the 2017–2018 academic year capacity, enrollment, and seating shortages or overages for schools that would serve the area around the Project Site.

TABLE IV.L.3-1
EXISTING ENROLLMENT AND CAPACITY

School Name and Grades	Current Capacity	Resident Enrollment	Actual Enrollment	Current Seating Overage/ (Shortage)	Overcrowded Now?
Los Feliz STEMM Magnet School (K-6)	609	575	716	34	No
Ramona School (K-6)	542	707	528	(165)	Yes
Thomas Starr King Middle School (6-8)	2,140	2,197	2,455	(57)	Yes
Joseph Le Conte Middle School (6-8)	601	1,099	836	(498)	Yes
John Marshall High School (9-12)	2,677	2,143	2,403	534	No
School Choice Area					
Helen Bernstein STEM (9-12)	728	1,363	567	198	No
Helen Bernstein (9-12)	833		604		

SOURCE: Appendix K-3.
NOTE: This information is based on the most recent available data (as of September 6, 2018) on operating capacities and enrollments.

As shown in Table IV.L.3-1, several schools within the area serving the Project Site currently experience overcrowding and are projected to experience overcrowding in the future. No new school construction is planned, and the data presented in these tables does take into account portable classrooms, additions being built on existing schools, student permits, transfers, programs serving choice areas, and other operational activities and education programming affecting the operating capacities and enrollments.[10]

[10] Appendix K-3.

(3) Developer Fee Program Office

The Developer Fee Program Office staff collects LAUSD developer fees on residential and commercial/industrial development projects that are within the LAUSD boundaries and outside the City of Los Angeles. The Developer Fee Program Office staff performs specialized accounting and statistical reporting for the Developer Fee Program and coordinates inter-agency collection requirements with staff from the City of Los Angeles. Office staff also (1) provides general and/or technical information relating to the Developer Fee Program to various departments of Building and Safety staff, to developer/owners, and to other interested individuals; 2) processes waivers to developer/owners based on approved exemption criteria; and 3) processes developer fee refunds.[11]

Education Code Section 17620 allows school districts to assess fees on new residential and commercial construction within their respective boundaries. These fees can be collected without special city or county approval, to fund the construction of school facilities necessitated by the impact of residential and commercial development activity. In addition, these fees can also be used to fund the reconstruction of school facilities to accommodate students generated from new development projects. Fees are collected immediately prior to the time of the issuance of a building permit by the City or the County.

[11] LAUSD 2018, 2018 Developer Fee Justification Study, March 2018.

3. Project Impacts

a) Thresholds of Significance

In accordance with the State California Environmental Quality Act (CEQA) Guidelines Appendix G (Appendix G), the Project would have a significant impact related to public schools if it would:

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

This analysis relies upon the Appendix G Thresholds. This analysis also uses factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold question. The L.A. CEQA Thresholds Guide states four criteria for consideration:

- The population increase resulting from the proposed 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. 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 LAUSD).

b) Methodology

The environmental impacts of a project with respect to schools are determined based on the enrollment and capacity of existing and reasonably foreseeable proposed schools in a project area, and the number of students that a project would generate upon occupancy of the project. The analysis estimates the number of students that a project would generate by using

LAUSD student generation rates.[12] Based on these projections, it is determined whether a project would exceed the capacity of any existing or proposed schools such that a new or expanded school would be needed, and whether construction of that new or expanded school could cause significant environmental impacts, as the following discussion addresses.

c) Project Design Features

No 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 governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?

(1) Impact Analysis

(a) Construction

The proposed Project would expand the existing Kaiser Permanente Los Angeles Medical Center campus by replacing facilities and adding new buildings. As such, construction activities associated with the Project would involve the demolition of existing structures, the construction of new medical office buildings (MOBs), parking facilities, and associated improvements, and the expansion of existing medical facilities. 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, because the Project would be implemented in three phases between 2020 to 2030, and most/all of the construction workers would not be needed continuously and only for varying portions of the Project phases, it is reasonable to assume that construction workers would work on construction sites and the Project Site on a temporary basis only and thus, 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 substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools, and impacts during the Project construction would be considered less than significant.**

[12] LAUSD, 2018 Developer Fee Justification Study, March 2018.

(b) Operation

The Project would not include a residential component, and therefore, would not directly generate new student enrollment. However, the hospital would generate increased employment opportunities, which could indirectly generate student enrollment. The Project would result in the construction of 401,100 square feet of MOBs under Option A or 433,100 square feet of MOBs under Option B (both inclusive of 533,400 square feet of parking). For the purposes of analysis, it is conservatively assumed that the Project would result in the construction of 433,100 square feet of MOBs under Option B. The Project would also result in the demolition of 219,112 square feet of MOBs, 13,277 square feet of commercial buildings, and a duplex. The Project would gradually be built in three phases between 2020 and 2030. Thus, employment opportunities and an indirect increase in student generation would not occur all at once. LAUSD annually assesses the need for new or expanded school facilities and takes into consideration new development projects and approximate student generation.

The number of students that would be generated by existing uses proposed for demolition has been estimated using the LAUSD student generation rates.[13] It should be noted that for residential units there is a breakdown between elementary school, middle school, and high school, and for nonresidential uses, the generation is determined through students per 1,000 square feet. **Tables IV.L-2 and IV.L-3** provide the student generation rates for the existing residential uses and nonresidential uses proposed for demolition, respectively.

TABLE IV.L.3-2
ESTIMATED NUMBER OF STUDENTS GENERATED BY THE EXISTING RESIDENTIAL USE

Type	Units	TK–6	7–8	9–12	Special Day Class	Total Students
Residential Multifamily[a]	2	1	1	1	1	4

SOURCE: LAUSD, 2018 Developer Fee Justification Study, March 2018.
NOTE:
[a] Student generation rates per household for residential uses are based on Table 3 of the LAUSD 2018 Developer Fee Justification Study: Elementary = 0.2269; Middle School = 0.0611; High School = 0.1296.

[13] LAUSD, 2018 Developer Fee Justification Study, March 2018.

TABLE IV.L.3-3
ESTIMATED NUMBER OF STUDENTS GENERATED BY THE EXISTING NONRESIDENTIAL USES

Type	Students per 1,000 square feet	Project Square Footage	Student Generation
Medical Offices	0.960	219,112	210
Standard Commercial Office[a]	1.077	13,277	14

SOURCE: LAUSD, 2018 Developer Fee Justification Study, March 2018.
NOTE:
[a] As described in Chapter II, Environmental Setting, the site contains one 3,928-square-foot commercial building with a 105-square-foot outbuilding and three commercial buildings, which are occupied by medical and dental office uses, with a combined floor area of 9,244 square feet, for a total of 13,277 (3,928 + 105 + 9,244 = 13,277).

As shown in Tables IV.L-2 and IV.L-3, the existing uses proposed for demolition could serve 228 students. **Table IV.L.3-4** provides the estimated student generation rates for the medical office uses that would be included in the proposed Project.

TABLE IV.L.3-4
ESTIMATED NUMBER OF STUDENTS GENERATED BY THE PROJECT

Type	Students per 1,000 square feet	Project Square Footage	Student Generation
Medical Offices	0.960	433,100	415
		Minus Existing	228
Total			**187**

SOURCE: LAUSD, 2018 Developer Fee Justification Study, March 2018.

As shown in Table IV.L.3-4, the Project would generate 187 additional students to the LAUSD schools in the vicinity of the Project Site. This number represents a conservative estimate and is likely to be less due to the potential for students to enroll at other LAUSD schools located away from home attendance area. Additionally, this assumes all students attend public schools in the area and do not attend private schools or participate in home schooling. As identified in Table IV.L.3-1, Ramona, King Middle School, and Le Conte Middle School are currently overcrowded. LAUSD notes that projections for those schools would be unchanged, as no expansion of these schools is planned for the foreseeable future.[14] Information regarding LAUSD projected capacities and enrollments is shown in **Table IV.L.3-5**, below. This table assumes the 187 students generated by the Project would be distributed evenly among the seven nearby schools.

[14] Appendix K-3.

TABLE IV.L.3-5
PROJECTED ENROLLMENT AND CAPACITY

School Name and Grades	Capacity	Projected Enrollment	Projected Seating Overage/ (Shortage)	Students Generated by Project	Projected Enrollment With Project	Projected Seating Overage/ (Shortage) With Project	Overcrowded in Future?
Los Feliz STEMM Magnet School (K-6)	609	605	4	31	636	(27)	Yes
Ramona School (K-6)	542	581	(39)	31	612	(70)	Yes
Thomas Starr King Middle School (6-8)	2,140	2,160	(20)	31	2,191	(51)	Yes
Joseph Le Conte Middle School (6-8)	601	1,015	(414)	31	1,046	(445)	Yes
John Marshall High School (9-12)	2,677	2,263	414	31	2,294	383	No
School Choice Area							
Helen Bernstein STEM (9-12)	728	1,145	416	32	1,177	1,113	No
Helen Bernstein (9-12)	833						

SOURCE: Appendix K-3.
NOTE: This information is based on the most recent available data (as of September 6, 2018) on operating capacities and enrollments. No new school construction is planned, and the data in this table already takes into account portable classrooms on site, additions being built on existing schools, student permits and transfers, programs serving choice areas, and any other operational activities or education programming affecting the operating capacities among LAUSD schools.

As shown in Table IV.L.3-5, Ramona, King Middle School, and Le Conte Middle School, which currently experience overcrowding, would continue to experience overcrowding in the future (with or without the proposed Project). Additionally, Los Feliz STEM, which does not currently experience overcrowding, is projected to experience overcrowding in the future. John Marshall High School and Helen Bernstein High School are not expected to experience overcrowding in the future. However, as previously discussed in Section IV.L.3.2(a), Regulatory Framework, Education Code Section 17620 allows school districts to assess fees on new residential and commercial construction within their respective boundaries. Pursuant to SB 50, the payment of these fees by a developer is considered full and complete mitigation of project-related school impacts. These fees can be collected without special city or county approval and used to fund the construction of school facilities necessitated by the impact of residential and commercial development activity. Using these funding sources, LAUSD would be able to continue to implement the New School Construction Program, a multiyear capital improvement program, which aims to reduce overcrowding throughout LAUSD. **Therefore, payment of the applicable school fees to LAUSD would allow LAUSD to provide adequate school facilities to serve the community, including new or expanded facilities as may be necessary. Accordingly, with adherence to existing regulations, impacts to school facilities during Project operation would be considered less than significant.**

(2) Mitigation Measures

Impacts regarding school facilities were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Impacts regarding 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 Chapter II, Environmental Setting, of this Draft EIR, there are 85 related projects in the Project vicinity (related projects). Together, the related projects within the City of Los Angeles would have the potential to generate students that would attend the same schools as the proposed Project. The construction of the Project in conjunction with the related projects would occur through the buildout year of the proposed Project (2030). As with the proposed Project, the related projects would be short term in nature and thus, it is reasonable to assume that construction workers would work on construction sites on a temporary basis only and are not likely to relocate their households as a consequence of the construction job opportunities.

All of the related projects are in the Hollywood area and are anticipated to generate students within the same schools as the Project. Based on proximity, it assumed that all related projects with residential components would attend the schools listed in Table IV.L.3-5. It is noted that although the analysis assumes the Project employees would generate students, it is likely employees from nonresidential uses would generate students in the vicinity of their place of residence. Therefore, the following estimates are conservative. As shown in Appendix X, the 85 related projects have resulted in 10,795 dwelling units. **Table IV.L.3-6** describes the student generation for residential related projects.

TABLE IV.L.3-6
ESTIMATED NUMBER OF STUDENTS GENERATED BY RESIDENTIAL RELATED PROJECTS

Size	Grade	Generation Rate	Student Generation
10,795 units	TK–6	0.2269	2,449
	7–8	0.0611	660
	9–12	0.1296	1,399
	Special Day Class	0.0194	209
Total			**4,717**

SOURCE: LAUSD, 2018 Developer Fee Justification Study, March 2018.

As previously described in Section IV.K, Population and Housing, of this Draft EIR, the related projects would generate approximately 43,669 employment opportunities in the City of Los Angeles. The calculation of cumulative housing units, population, and employees attributable to the related projects are provided in Appendix J Population and Housing Calculations. Using the LAUSD generation rate of 0.2249 students per employee, the nonresidential related projects would generate approximately 9,821 students. Thus, related projects from residential and nonresidential uses would result in approximately 14,538 new students: 4,717 students from residential related projects (see Table IV.L.3-6) and 9,821 students from nonresidential related projects.

Table IV.L.3-7 illustrates the cumulative impacts of the related projects on projected enrollment for schools in the Project's boundaries. For nonresidential students, it is assumed the 9,821 students generated by employment would be distributed evenly among the schools.

TABLE IV.L.3-7
CUMULATIVE PROJECTED ENROLLMENT AND CAPACITY

School Name and Grades	Capacity	Projected Enrollment	Projected Seating Overage/ (Shortage)	Students Generated by Project + Related Projects	Projected Enrollment With Project + Related Projects	Projected Seating Overage/ (Shortage) With Project + Related Projects	Overcrowded in Future?
Los Feliz STEMM Magnet School (K–6)	609	605	4	2,893[a]	3,498	(2,889)	Yes
Ramona School (K–6)	542	581	(39)	2,893[a]	3,474	(2,932)	Yes
Thomas Starr King Middle School (6–8)	2,140	2,160	(20)	1,998[b]	4,158	(2,018)	Yes
Joseph Le Conte Middle School (6–8)	601	1,015	(414)	1,998[b]	3,013	(2,412)	Yes
John Marshall High School (9–12)	2,677	2,263	414	2,367[c]	4,630	(1,953)	Yes
School Choice Area							
Helen Bernstein STEM (9–12)	728	1,145	416	2,367[d]	3,512	(3,096)	Yes
Helen Bernstein (9–12)	833						

SOURCE: Appendix K-3.
NOTES:
[a] 31 Project + 1,637 nonresidential + (2,449/2) = 2,893
[b] 31 Project + 1,637 nonresidential + (660/2) = 1,998
[c] 31 Project + 1,637 nonresidential + (1,399/2) =2,367
[d] 32 Project + 1,636 nonresidential + (1,399/2) =2,367

Similar to the Project, the impacts of cumulative development on local schools is likely to be overstated, since the projected population increase from the related projects is conservative. As with the Project, projected student generation is likely to be less than estimated in the above analysis, as it assumes all students attend public schools in the area and do not attend private schools or participate in home schooling. This analysis also does not take into account projects that would not be constructed and occupied within the time frame analyzed, related projects that may be reduced in size, or demolition of existing housing or uses to accommodate the planned new development. Finally, actual enrollment tends to run lower than the residential enrollment, which is based on the number of students living in a school's attendance area. Some of the employees generated by the 85 related projects may already reside in areas served by the LAUSD and would have students that may already be enrolled in LAUSD schools. In addition, the future LAUSD enrollment estimates already account for at least some growth that may be inclusive of the 85 related projects cited above. For these reasons, the above analysis is considered conservative and likely overestimates the Project's actual potential to generate new students.

Based on the analysis, the Project, in combination with the Related Projects, could require new or expanded school facilities. However, LAUSD continually monitors enrollment numbers at all schools within the district, and seating shortages can be addressed through changes in attendance boundaries and new/expanded school facilities. Provided that LAUSD has not yet identified the location and operational characteristics of any new or expanded school facilities to specifically serve the Project and the related projects, it would require speculation to determine how any future shortages would be addressed, including where and what those facilities may be. Therefore, at such time as LAUSD identifies the school facilities, LAUSD would evaluate the environmental impacts of those facilities under CEQA as a project independent of the proposed Project.

Furthermore, as with the Project, future development, including the related projects, would be required to pay development fees for schools to LAUSD prior to issuance of building permits pursuant to SB 50. The payment of these fees would be considered full and complete mitigation of school impacts generated by the related projects. Payment of these development fees would offset any potential cumulative impacts that could occur to LAUSD from development of the Project and related projects within the LAUSD service area for the Project Site. **Therefore, the Project's contribution towards school impacts would not be cumulatively considerable, and cumulative impacts are considered less than significant.**

(2) Mitigation Measures

Cumulative impacts regarding school facilities would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Cumulative impacts regarding 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.

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