

4. ENVIRONMENTAL IMPACT ANALYSIS

K. PUBLIC SERVICES

4 SCHOOLS

1. INTRODUCTION

This section analyzes the Project's potential impacts on public schools operated by the Los Angeles Unified School District (LAUSD) and other public schools in the Project vicinity. The analysis identifies the potential impacts of the proposed Project on school enrollment and capacity, and whether new or physically altered school facilities may be required. This section is based, in part, on information provided by the LAUSD (included in **Appendix G-4, School District Correspondence**, of this Draft EIR). This section also incorporates information from Los County General Plan Update (2035) and associated EIR (2015), and other County plans and environmental documents.

2. ENVIRONMENTAL SETTING

a. Existing Conditions

The Harbor-UCLA Medical Center Campus is located in the unincorporated community of West Carson in Los Angeles County, within relatively short distance of several incorporated cities including Los Angeles, Torrance and Carson. The site falls within the educational jurisdiction of, and is served by, the Los Angeles County Office of Education (COE) and LAUSD.¹

(1) Los Angeles County Office of Education (COE)

The role of Los Angeles County in developing and managing educational facilities and programs is limited. However, COE serves as an intermediary between the local school districts in the County (such as LAUSD) and the California Department of Education. The COE provides a vision statement and strategic opportunities for educational facility development to coordinate the assessment of facility needs and the construction of schools that fall to individual school districts. In 2013, there were 88 local school districts within in the COE with a total enrollment of 1,564,205 students.²

(2) Los Angeles Unified School District (LAUSD)

LAUSD provides K-12 educational facilities and services to a 720-square-mile service area that includes the unincorporated areas of Los Angeles County and many of the incorporated cities within the county (including Los Angeles and Carson).³ More than 640,000 students in kindergarten through 12th grade are enrolled in LAUSD, which is comprised of more than 900 schools and 197 public charter schools.⁴ LAUSD

¹ Rena Perez, Director, Master Planning & Demographics, LAUSD, correspondence dated January 29, 2016 and included in Appendix G-4 of this Draft EIR.

² County of Los Angeles, Environmental Impact Report for the Los Angeles County General Plan Update (2035), SCH. No. 2011081042, p.5.14-18. Certified March 24, 2015.

³ County of Los Angeles, Environmental Impact Report for the LAC+USC Medical Center Campus Master Plan Project, SCH #2014051061, p.3.12-18. Certified November 18, 2014.

⁴ Ibid.

provides K-12 educational facilities and services to Project Site and to the majority of community north, east and south of the Project Site (e.g., unincorporated Los Angeles County, the city of Los Angeles, and the city of Carson, but not the city of Torrance which has its own school district).

Funding sources used by LAUSD for new school construction and the expansion, modernization, improvement and repair of existing school facilities include, but are not limited to, a \$19.5 billion voter-approved District program initiated in 1997, the collection of State-mandated school impact fees permitted under California Government Code Section 65995 and State Senate Bill (SB) 50, State Proposition 47 and 55 school bonds, and Assembly Bill 16 (Critically Overcrowded School Facilities Program) funds.⁵ Funding sources for LAUSD school operation comes primarily from the State general fund and local property taxes.⁶

As indicated in **Figure 4.K.4-1, School Facilities Map**, and **Table 4.K.4-1, Public Schools in the Project Vicinity**, nine LAUSD schools and three Torrance Unified School District (TUSD) schools occur within a three-mile radius of the Project Site. According to the LAUSD, the Project Site is located within the attendance area of, and is served by, three of the LAUSD schools, including Meyler Street Elementary, M. White Middle School, and Narbonne Senior High (SH) School.⁷ Meyler Street Elementary, located at 1123 W. 223rd Street in Torrance approximately 0.5 miles south of the Project Site, is a grade K-5 school which in the 2013-2014 school year had an enrollment of 818 and a capacity of 846.⁸ M. White Middle School, located at 22102 Figueroa Street in Carson approximately 0.8 miles southeast of the Project Site, is a grade 6-8 school which in the 2013-2014 school year had an enrollment of 1,428 and a capacity of 1,743.⁹ Narbonne SH, located at 24300 S. Western Avenue in Harbor City approximately 3.0 miles southwest of the Project Site, is a grade 9-12 school which in the 2013-2014 school year had an enrollment of 3,207 and a capacity of 3,443, and which hosts as a separate personalized campus LAUSD's Humanities and Arts Academy of Los Angeles (e.g., HArts Academy).¹⁰ According to the LAUSD, while the number of seats at each of these three schools during the 2013-2014 school year exceeded enrollment, because of how LAUSD measures school overcrowding, Meyler Street Elementary was over capacity during the 2013-2014 school year.¹¹ As indicated in Figure 4.K.4-1 and Table 4.K.4-1, the other LAUSD schools located within a three-mile radius of the Project Site include Halldale Avenue Elementary, Van Deene Avenue Elementary, Caroldale Avenue Elementary, Carson Street Elementary, Dolores Street Elementary, and Carson High School.

According to the LAUSD, no new LAUSD schools are currently planned within the Project vicinity, although the White, Carnegie and Willmington Middle Schools, and the Carodale Learning Community School, provide attendance options for grade 6-8 students located within the M. White Middle School attendance area (subject to space availability at these optional schools).¹²

⁵ LAUSD, *Fingertip Facts 2013-2014*.

⁶ *Ibid.*

⁷ Rena Perez, Director, Master Planning & Demographics, LAUSD, correspondence dated January 29, 2016 and included in Appendix G-4 of this Draft EIR.

⁸ *Ibid.*

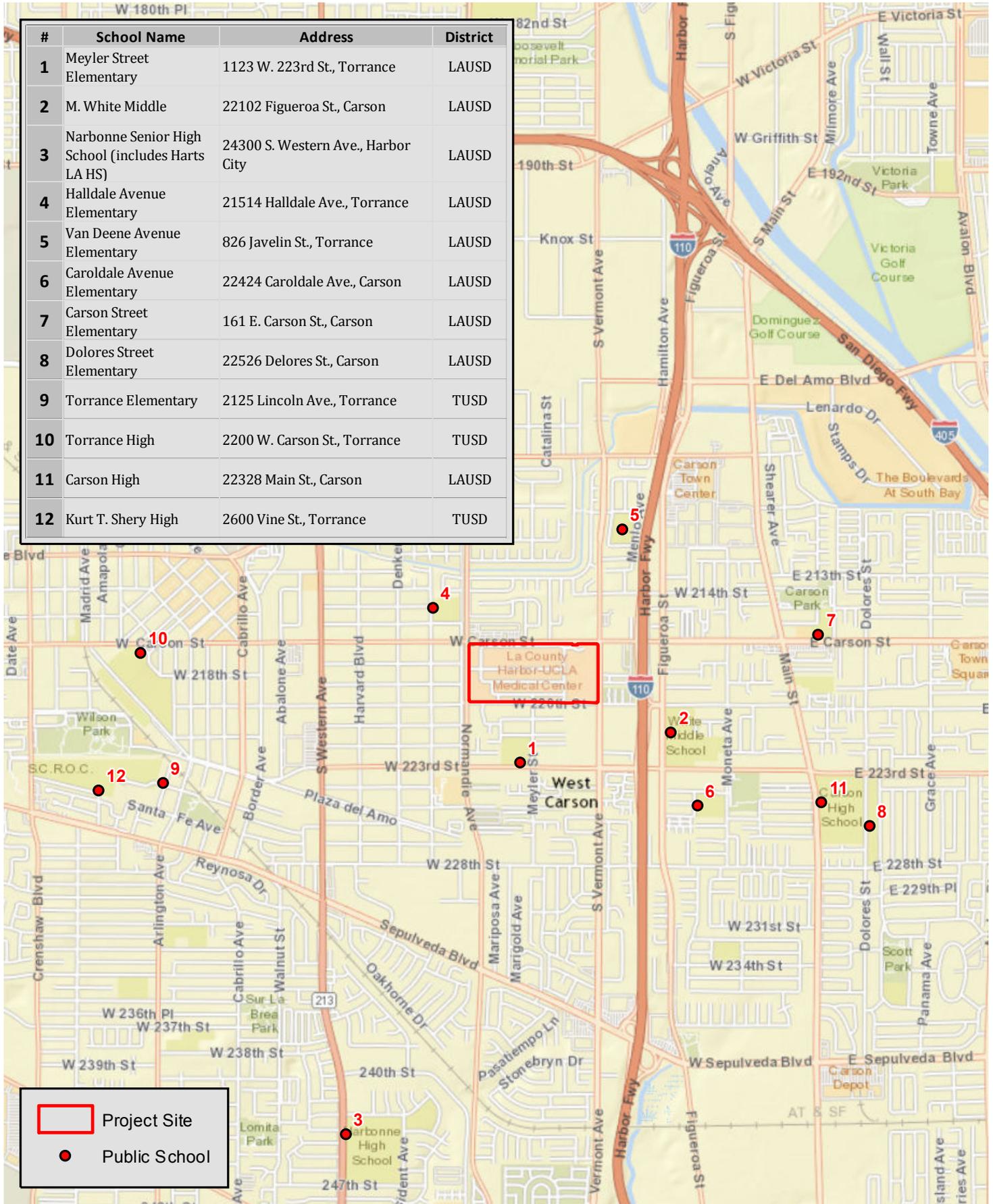
⁹ *Ibid.*

¹⁰ *Ibid.* The enrollments and capacities of Narbonne SH and HArts Academy are considered together in this analysis.

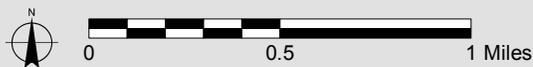
¹¹ *Ibid.* LAUSD considers a school to be overcrowded or over capacity if enrollment is either within 30 seats or less of capacity or over the capacity.

¹² *Ibid.*

| # | School Name | Address | District |
|----|--|------------------------------------|----------|
| 1 | Meyler Street Elementary | 1123 W. 223rd St., Torrance | LAUSD |
| 2 | M. White Middle | 22102 Figueroa St., Carson | LAUSD |
| 3 | Narbonne Senior High School (includes Harts LA HS) | 24300 S. Western Ave., Harbor City | LAUSD |
| 4 | Halldale Avenue Elementary | 21514 Halldale Ave., Torrance | LAUSD |
| 5 | Van Deene Avenue Elementary | 826 Javelin St., Torrance | LAUSD |
| 6 | Caroldale Avenue Elementary | 22424 Caroldale Ave., Carson | LAUSD |
| 7 | Carson Street Elementary | 161 E. Carson St., Carson | LAUSD |
| 8 | Dolores Street Elementary | 22526 Dolores St., Carson | LAUSD |
| 9 | Torrance Elementary | 2125 Lincoln Ave., Torrance | TUSD |
| 10 | Torrance High | 2200 W. Carson St., Torrance | TUSD |
| 11 | Carson High | 22328 Main St., Carson | LAUSD |
| 12 | Kurt T. Shery High | 2600 Vine St., Torrance | TUSD |



Project Site
● Public School



Public Schools Map

FIGURE

4.K.4-1

Harbor-UCLA Medical Center Master Plan
 Source: ESRI Street Map, 2009; PCR Services Corporation, March 2016.

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Table 4.K.4-1

Public Schools in the Project Vicinity

| School Name | Address | District | Grades | Distance (miles) | 2013-2014 ^a | | | ~ 2019 ^b | | |
|---|---|----------|--------|------------------|------------------------|----------|----------------------------|---------------------|----------|----------------------------|
| | | | | | Enrollment | Capacity | Over Capacity ^c | Enrollment | Capacity | Over Capacity ^c |
| LAUSD Schools Serving the Project Site^a | | | | | | | | | | |
| Meyler Street Elementary | 1123 W. 223 rd St., Torrance | LAUSD | K-5 | 0.5 | 818 | 846 | Yes | 909 | 733 | Yes |
| M. White Middle | 22102 Figueroa St., Carson | LAUSD | 6-8 | 0.8 | 1,428 | 1,743 | No | 1,270 | 1,543 | No |
| Narbonne Senior High School (includes HArts Academy) | 24300 S. Western Ave., Harbor City | LAUSD | 9-12 | 3.0 | 3,207 | 3,443 | No | 3,177 | 2,910 | Yes |
| Other Public Schools in the Project Vicinity | | | | | | | | | | |
| Halldale Avenue Elementary | 21514 Halldale Ave., Torrance | LAUSD | K-5 | 0.3 | | | | | | |
| Van Deene Avenue Elementary | 826 Javelin St., Torrance | LAUSD | K-5 | 0.9 | | | | | | |
| Caroldale Avenue Elementary | 22424 Caroldale Ave., Carson | LAUSD | K-5 | 1.3 | | | | | | |
| Carson Street Elementary | 161 E. Carson St., Carson | LAUSD | K-5 | 1.3 | | | | N/A ^d | | |
| Dolores Street Elementary | 22526 Delores St., Carson | LAUSD | K-5 | 1.8 | | | | | | |
| Torrance Elementary | 2125 Lincoln Ave., Torrance | TUSD | K-5 | 2.0 | | | | | | |
| Torrance High | 2200 W. Carson St., Torrance | TUSD | 9-12 | 1.5 | | | | | | |
| Carson High | 22328 Main St., Carson | LAUSD | 9-12 | 1.7 | | | | | | |
| Kurt T. Shery High | 2600 Vine St., Torrance | TUSD | 9-12 | 2.9 | | | | | | |

^a Rena Perez, Director, Master Planning & Demographics, LAUSD, correspondence dated January 29, 2016 and included in Appendix G-4 of this Draft EIR.

^b Ibid. LAUSD only makes five year projections of future enrollment and capacity. Hence, LAUSD projections do not exist of enrollments and capacities at the anticipated Project buildout year of 2030.

^c LAUSD considers a school to be "Overcapacity" if enrollment is either within 30 seats or less of the capacity or over the capacity.

^d Enrollment and capacity information for these schools was not provided by LAUSD because the Project Site is not located within the service areas of these schools.

Source: PCR Services Corporation, March 2016.

(3) Torrance Unified School District

The Torrance Unified School District (TUSD) provides K-12 educational facilities and services to the portions of the community west the Project site (e.g., the City of Torrance), and while TUSD is not responsible for providing school services to the Project Site, HUCLA employees, patients and visitors that may live in the City of Torrance are provided school services by TUSD. Total enrollment in the TUSD during the 2013-2014 school year was 24,324 students.¹³ As indicated in Figure 4.K.4-1 and Table 4.K.4-1, three TUSD schools are located within a three-mile radius of the Project Site, including Torrance Elementary, Torrance High School, and Kurt T. Shery High School.

b Regulatory Setting

(1) Federal

There are no federal schools regulations pertinent to the Project.

(2) State

(a) Senate Bill 50

Senate Bill 50 (SB 50, codified in California Government Code Section 65995 et seq., was enacted in 1988 to address how schools are financed and how development projects may be assessed for associated school impacts.¹⁴ SB 50 sets forth the “exclusive methods of considering and mitigating impacts on school facilities” resulting from any state or local planning and/or development projects, regardless of whether its character is legislative, adjudicative, or both (Govt. Code §65996[a]).¹⁵ Section 65995 provides that “[t]he payment or satisfaction of a fee, charge, or other requirement levied or imposed pursuant to Section 17620 of the Education Code in the amount specified in Section 65995 ... are hereby deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving but not limited to, the planning, use, or development of real property, or any change in governmental organization ... on the provision of adequate school facilities” Govt. Code §65995[h]).¹⁶ The reference in Section 65995(h) to fees “imposed pursuant to Section 17620 of the Education Code in the amount specified in Section 65995” is a reference to per-square-foot school fees than can be imposed by school districts on new residential, commercial and industrial construction.¹⁷ Education Code Section 17620 provides the basic authority for school districts to levy fees against construction for purposes of funding construction or reconstruction of school facilities, subject to limits set forth in Government Code Section 65995.¹⁸

As stated in Section 65995 (d), facilities that are owned and occupied by one or more agencies of federal, state, or local governments are exempt from these fees. Therefore, the fee does not apply to the proposed

¹³ *County of Los Angeles, Environmental Impact Report for the Los Angeles County General Plan Update (2035) SCH No. 201108104, Table 5.14-1. Certified March 24, 2015.*

¹⁴ *Ibid*, p.5.4-23. Certified March 24, 2015.

¹⁵ *Ibid*.

¹⁶ *Ibid*.

¹⁷ *Ibid*.

¹⁸ *Ibid*.

Project. However, it could apply to any new residential, commercial, or industrial development in the Project vicinity, as noted in subsection e, Cumulative Impacts.

(b) Assembly Bill 16

In 2002, AB 16 created the Critically Overcrowded School Facilities Program (Education Code, Article 11, Critically Overcrowded School Facilities, Sections 17078.10-17078.30), which supplements the new construction provisions within the School Facilities Program (SFP). The SFP provides State funding assistance for two major types of facility construction projects: new construction and modernization. The Critically Overcrowded School Facilities program allows school districts with critically overcrowded school facilities, as determined by the California Department of Education (CDE), to apply for new construction projects in advance of meeting all SFP new construction program requirements. Districts with SFP new construction eligibility and school sites included on a CDE list of source schools may apply.

(3) Local

(a) County of Los Angeles General Plan

As a County-run facility operated on County-owned land, the proposed Project is subject to the Los Angeles County General Plan Update (2035), including the following applicable polices from the Public Services and Facilities Element. This goal and these policies are more applicable to the local school districts, and to County and local school district coordination, than they are to development projects such as the proposed HUCLA Campus Master Plan Project, but are nevertheless identified for purposes of public disclosure.

Goal PS/F 7: A County with adequate educational facilities.

- **Policy PS/F 7.1:** Encourage the joint-use of school sites for community activities and other appropriate uses.
- **Policy PS/F 7.2:** Proactively work with school facilities and education providers to coordinate land use and facilities planning.
- **Policy PS/F 7.3:** Encourage adequate facilities for early care and education.

(b) LAUSD School Facilities Fees Under SB 50

The latest (January 2015) LAUSD School Facilities Fees authorized under SB 50 are \$3.36 per square foot for new residential construction, \$0.54 per square foot for new commercial/industrial construction, and \$0.07 per square foot for new parking structures.¹⁹ Facilities that are owned and occupied by one or more agencies of federal, state, or local governments are exempt from these fees. Therefore, the fee does not apply to the Proposed Project.

3. ENVIRONMENTAL IMPACTS

a. Methodology

¹⁹ Sonja White, Analyst, Los Angeles Unified School District, Developer Fee Program Office, April 13, 2015.

As the Project Site is located within the service areas of three LAUSD schools, this analysis evaluates the impacts of the proposed Project on these three LAUSD schools.

The methodology for this analysis included: (1) corresponding with LAUSD to request current information regarding the LAUSD schools that would serve the Project, the existing and projected year 2030 (the buildout year of the proposed Project) enrollments and capacities at those schools, including whether those schools are and/or are projected to be over capacity; (2) estimating the increase in students (if any) to be generated by the Project's employee, patient and visitor populations; (3) evaluating the impacts of these students on the capacities of the three LAUSD schools to serve the Project; and (4) based on this information, determining whether new or expanded schools would be required to serve the Project, and if so, whether the construction of these schools would result in substantial adverse physical effects.

Because the Project Site is located within three miles or less of six other LAUSD schools and three TUSD schools, the analysis also evaluates potential Project impacts on those schools (although at a lesser level of detail given that the Project Site is not located within the service areas of those schools).

As discussed previously, in addition to the correspondence from the LAUSD (which is included in Appendix G-4 of this Draft EIR), this section is based on information from the Los County General Plan Update (2035) and associated EIR (2015), and other County plans and environmental documents.

b. Thresholds of Significance

The potential for school impacts is based on thresholds derived from the County's Initial Study Checklist questions, which are based on Appendix G of the State CEQA Guidelines. This question is as follows:

(XV) Public Services. Would the project:

- a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
 - Schools?

Based on this factor, the Project would have a potentially significant impact on schools if it would result in the following:

SCHOOLS-1: Would the Project require the addition of new or physically altered school facilities to maintain acceptable service ratios or other performance objectives, the construction of which would result in a substantial adverse physical impact?

c. Project Characteristics or Design Features

The Project would address the future needs of the communities served by the Harbor-UCLA Medical Center Campus (Campus). The existing Campus contains approximately 1,279,300 square feet of developed floor area, including the recently completed Surgery and Emergency Room Replacement Project (Replacement Project). The Master Plan Project encompasses construction of a New Hospital Tower that meets current

seismic building codes, renovation of the existing Hospital tower to house non-acute care support uses, replacement of aging facilities, reconfigured vehicular and pedestrian access to and circulation within the Campus, and implementation of a cohesive site design that enhances the experience of staff, patients, and visitors. This would result in a net increase of 1,178,071 square feet of building floor area, to include new hospital, medical office, medical research, service commercial, and parking uses, a net increase in Campus-wide employees and annual patient visits of 37 percent (2,030 employees) and 34 percent (185,745 annual visits or 714 daily visits²⁰), respectively. Project construction would occur in phases through the year 2030. See Chapter 2.0, Project Description, of this Draft EIR for further information.

The Project would implement the following Project Design Feature (PDF) designed to mitigate Project impacts on public schools:

d. Project Impacts

Threshold SCHOOLS-1: Would the Project require the addition of new or physically altered school facilities to maintain acceptable service ratios or other performance standards, the construction of which would result in a substantial adverse physical impact?

Impact Statement SCHOOLS-1: *Project construction and operation would not be expected to create a demand for schools that would require new or physically altered public schools, the construction of which would result in a substantial adverse physical impact. Therefore, the impact would be less than significant.*

(1) Construction

Project construction activities would not physically affect existing public schools as no public schools are located on or directly adjacent to the Project Site, and the nearest public school (Halldale Avenue Elementary) is 0.5 miles away. Furthermore, the staging of Project construction activities would occur on-site, and access to off-site uses during construction would be maintained as required by the County Code, such that access to and parking at existing public schools would be maintained during Project construction (see Section 4.L., *Transportation and Traffic*, of this Draft EIR for further discussion).

Project construction would require construction workers at the HUCLA Campus intermittently through the year 2030 as discrete phases of the Project are constructed. The exact number of construction workers during each construction phase is not known at this time. However, given the general accessibility of the Project Site and the availability of construction workers in the Los Angeles area, it is unlikely that a substantial number of construction workers would relocate to the Project area and have children that would use local public schools. Hence, new or physically altered local public schools would not be required to provide service to the children of Project construction workers and maintain acceptable service ratios and other performance standards.

²⁰ Daily visits were estimated based on the following formula which assumes that patients visits occur during workdays: 52 weeks per year times 5 days a week = 260 weekdays. So, 185,745 patients ÷ 260 days = ~715 patients a day. This provides a conservative estimate because it assumes that patient visits are restricted to weekdays, largely because most of the on-site clinics and other non-hospital on-site medical uses would only be open during weekdays.

Finally, the New Hospital and of some of the new medical clinic and R&D uses under the Project would include teaching components, the construction of which could result in environmental effects (e.g., visual impacts, dust and other air emissions, noise, and traffic during the construction period). However, these environmental effects have been evaluated as part of the construction impacts of the Project in Sections 4.A., *Aesthetics*, 4.B., *Air Quality*, 4.I., *Noise*, and 4.L., *Transportation and Traffic*, of this Draft EIR, and no additional substantial environmental effects would occur.

Based on the above, Project construction would not require new or physically altered public schools, and the impact would be less than significant.

(2) Operation

As indicated previously in Subsection 2.a, Environmental Setting, the Project Site is located within the boundaries of LAUSD and is served by (e.g., is located within the service areas of) Meyler Street Elementary, M. White Middle School, and Narbonne Senior High School (including HArts Academy). As indicated previously in Subsection 3.c, *Project Characteristics and Design Features*, the Project would result in an increase of 1,178,071 square feet of non-residential floor area (e.g., hospital, medical office, medical research, service commercial, and parking structure uses), an increase in Campus-wide employees and annual patient visits of 37 percent (2,030 employees) and 34 percent (185,745 visits), respectively, and an unknown increase in Campus visitors.

Table 4.K.4-2, *Project Student Generation*, provides an estimate of the number of students that would be generated by the proposed Project. As indicated, the Project would generate an estimated 29 grade K-5 students, 14 grade 6-8 students, and 18 grade 9-12 students.

Assuming that all Project students would attend Meyler Street Elementary, M. White Middle School, and Narbonne Senior High School (including HArts Academy), adequate capacity would be available at M. White Middle School to serve these students as indicated in Table 4.K.4-1, but these students would exacerbate the overcapacity conditions projected by LAUSD at Meyler Street Elementary and Narbonne Senior High School. However, multiple factors would help mitigate any such potential overages. First, while the Project Site is located within the service areas of Meyler Street Elementary and Narbonne Senior High School, the families of Project employees would not reside on-site, but rather would reside within the local community and/or greater Los Angeles area. Therefore, rather than being restricted to these three schools, it is highly likely that Project student attendance would be split among the 11 elementary and high schools in the local area listed in Table 4.K.4-1 and possibly beyond. Second, even if some of the Project grade K-5 and 9-12 students were to attend Meyler Street Elementary and Narbonne Senior High School, it is unlikely that these students alone would necessitate the need to construct new or physically altered school facilities given the small numbers of students involved.

Due to the lack of residential uses proposed in the Project, it is likely that the Project's indirectly generated students will be less than the amount calculated above. Because the calculated students represent a conservative generation based on the land uses, it is highly unlikely that the Project would generate enough students to necessitate the need to construct new or physically altered school facilities. Therefore, Project operational impacts on schools would be less than significant.

Table 4.K.4-2

Project Student Generation

| Grade Level | Land Use | Net Increase in Development (sf) | Generate Rate Students per 1,000 sf) ^a | Students |
|-------------|-----------------------|----------------------------------|---|-----------|
| K-5 | Administrative Office | 107,200 | 0.0278 | 2.98 |
| | Day Care Center | 0 | -- | -- |
| | Central Utilities | 16,486 | 0.0214 | 0.35 |
| | Hospital | 553,845 | 0.0221 | 12.24 |
| | Library | 0 | -- | -- |
| | Medical Office | 153,196 | 0.0278 | 4.26 |
| | Biomedical R&D | 380,246 | 0.0242 | 9.20 |
| | Warehouse/Storage | (45,402) | 0.0214 | (0.97) |
| | Retail | 35,000 | 0.0178 | 0.62 |
| | | | Total K-5 | 29 |
| 6-8 | Administrative Office | 107,200 | 0.0139 | 1.49 |
| | Day Care Center | 0 | -- | -- |
| | Central Utilities | 16,486 | 0.0108 | 0.18 |
| | Hospital | 553,845 | 0.0111 | 6.15 |
| | Library | 0 | -- | -- |
| | Medical Office | 153,196 | 0.0139 | 2.13 |
| | Biomedical R&D | 380,246 | 0.0121 | 4.60 |
| | Warehouse/Storage | (45,402) | 0.0108 | (0.49) |
| | Retail | 35,000 | 0.0089 | 0.31 |
| | | | Total 6-8 | 14 |
| 9-12 | Administrative Office | 107,200 | 0.0173 | 1.85 |
| | Day Care Center | 0 | -- | -- |
| | Central Utilities | 16,486 | 0.0133 | 0.22 |
| | Hospital | 553,845 | 0.0138 | 7.64 |
| | Library | 0 | -- | -- |
| | Medical Office | 153,196 | 0.0173 | 2.65 |
| | Biomedical R&D | 380,246 | 0.0151 | 5.74 |
| | Warehouse/Storage | (45,402) | 0.0133 | (0.60) |
| | Retail | 35,000 | 0.0111 | 0.39 |
| | | | Total 9-12 | 18 |
| | | | Total K-12 | 61 |

^a LAUSD Commercial/Industrial Development School Fee Justification Study, p.19, September 27, 2010.

Source: PCR Services Corporation, March 2016.

e. Cumulative Impacts

Chapter 3.0, *General Description of Environmental Setting*, of this Draft EIR provides a list of 26 related projects that are planned or are under construction within the vicinity of the proposed Project. **Table 4.K.4-3, Related Projects for Schools**, identifies these Projects. As indicated, these related projects

would include 2,835 dwelling units (du), 300 hotel rooms, and approximately 1.95 million square feet of non-residential floor area.

Table 4.K.4-4, *Cumulative Student Generation*, provides an estimate of the number of students to be generated by the related projects along with the proposed Project. As indicated, related projects along with the proposed Project would generate an estimated 541 grade K-5 students, 164 grade 6-8 students, and 302 grade 9-12 students.

The development of the related projects, along with the proposed Project, would increase the demand for public schools in the local area from LAUSD and TUSD, and could potentially contribute to the future need for new or expanded school facilities in the Project vicinity. However, pursuant to SB 50 (Section 65995[h] of the California Government Code), the related projects and the proposed Project would be required to pay the LAUSD School Facilities Fees authorized under SB 50 within the LAUSD, and the school facilities fees authorized by SB 50 within the TUSD for those related projects served by the TUSD, which, per Section 65995[h], would represent “full and complete mitigation” for impacts to schools.²¹ Also, LAUSD is currently engaged in a multi-year capital improvement program to construct 131 new schools to accommodate projected growth.²² Furthermore, the Project and the related Projects would pay property and other taxes and fees, a portion of which would go to the LAUSD and TUSD for school facilities and services.

As indicated above, the related projects and the proposed Project could potentially contribute to the future need for new or expanded school facilities in the Project vicinity. While the construction of any such schools could potentially result in substantial adverse physical impacts, it would be speculative to predict where and when a new school would be needed as LAUSD does not currently have plans for a new school in the area.²³ Therefore, it would be speculative to predict the environmental effects resulting from any such improvements, and per State *CEQA Guidelines* Section 15145 regarding speculation, no further analysis is required. Based on the above, cumulative schools impacts would be less than significant.

4. MITIGATION MEASURES

No mitigation measures are required.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

The Project would have less than significant Project-level schools impacts. The Project’s contribution to cumulative impacts would not be cumulatively considerable.

²¹ *County of Los Angeles, Environmental Impact Report for the Los Angeles County General Plan Update (2035), SCH. No. 2011081042, p.5.4-23. Certified March 24, 2015.*

²² *County of Los Angeles, Environmental Impact Report for the LAC+USC Medical Center Campus Master Plan Project, SCH #2014051061, p.3.12-18. Certified November 18, 2014.*

²³ *Rena Perez, Director, Master Planning & Demographics, LAUSD, correspondence dated January 29, 2016 and included in Appendix G-4 of this Draft EIR.*

Table 4.K.4-3

Related Projects for Schools

| Id | Jurisdiction | Project location | Land use | Size |
|-----------|---------------------|--|-------------------------|--------------------|
| 1 | County | 24500 Normandie Ave | Apartments | 112 du |
| | | | Retail | 3.9 ksf |
| 2 | County | 1028 W 223 rd St | Condos | 19 du |
| 3 | County | 22700 Meyer St | Condos | 60 du |
| 4 | County | 19208 S Vermont Ave | Condos | 20 du |
| 5 | Carson | 440 Sepulveda Blvd | Apartments | 11 du |
| 6 | Carson | 628 Lincoln St | Single Family | 3 du |
| 7 | Carson | 616 E Carson | Apartments | 152 du |
| | | | Retail | 13 ksf |
| 8 | Carson | 19220 S Main St | Commercial | 65 ksf |
| 9 | Carson | 402 E Sepulveda Blvd | Apartments | 65 du |
| | | | Retail | 3 ksf |
| 10 | Carson | 21521 S Avalon Blvd | Apartments | 357 du |
| | | | Retail | 32 ksf |
| 11 | Carson | 23401 S Avalon Blvd | Retail | 6.3 ksf |
| 12 | Carson | 21791 Moneta Ave | Apartments | 13 du |
| 13 | Carson | 20920 Chico St | Medical | 11.34 ksf |
| 14 | Carson | 22303 Avalon | Automated Car Wash | 4.673 ksf |
| | | | Office Space | 0.48 ksf |
| 15 | Carson | Carson Marketplace | Regional Retail | 1,370 ksf |
| | | | Neighborhood Retail | 130 ksf |
| | | | Residential | 1,550 du |
| | | | Hotel | 300 rooms |
| | | | Restaurants | 81.125 ksf |
| | | | Commercial Recreational | 214 ksf |
| 16 | Los Angeles | 1311 W Sepulveda Blvd | Apartments | 352 du |
| | | | Retail | 17.904 ksf |
| 17 | Los Angeles | 21176 S Western Ave | Retail | 0.836 ksf |
| 18 | Los Angeles | 20805-22341 S. Normandie Ave | Single Family | 63 du |
| 19 | Torrance | 1640 Cabrillo Ave | Apartments | 44 du |
| | | | Retail | 3.7 ksf |
| 20 | Torrance | 1752 Border Ave | Warehouse | 10 ksf |
| | | | Automobile Care Center | 3 ksf |
| 21 | Torrance | 570 Alaska Ave | Warehouse | 31.015 ksf |
| 22 | Torrance | 2540 Sepulveda Blvd | Automobile Care Center | 2.525 ksf |
| 23 | Torrance | 465 Crenshaw Blvd | Transit Center | 17.8 ksf |
| 24 | Torrance | 23625 Arlington Ave | Apartments | 14 du |
| 25 | Torrance | 20405 Gramercy Place | Light Industrial | 17 ksf |
| 26 | Torrance | 1750 214 th St/1600 Abalone St | Warehouse | 30 ksf |
| | | | Manufacturing | 13 ksf |
| | | Total | Residential | 2,835 du |
| | | | Hotel Rooms | 300 rooms |
| | | | Non-Residential | 1,951.6 ksf |

Source: PCR Services Corporation, 2016. Based on the Related Projects Table from the Fehr and Peers Traffic Study, 2016.

Table 4.K.4-4

Cumulative Student Generation

| Grade Level | Land Use | Related Projects | | | With Proposed Project |
|-------------|-----------------|------------------|--|------------|-----------------------|
| | | Development (sf) | Generate Rate Students per 1,000 sf ^a | Students | Students |
| K-5 | Residential | 2,835 du | 0.1649 | 467.49 | 467.49 |
| | Non-Residential | 1,951.6 ksf | 0.0228 | 44.50 | 73.50 |
| | | | Total K-5 | 512 | 541 |
| 6-8 | Residential | 2,835 du | 0.0450 | 127.58 | 127.58 |
| | Non-Residential | 1,951.6 ksf | 0.0114 | 22.25 | 36.25 |
| | | | Total 6-8 | 150 | 164 |
| 9-12 | Residential | 2,835 du | 0.0903 | 256.00 | 256.00 |
| | Non-Residential | 1,951.6 ksf | 0.0142 | 27.71 | 45.71 |
| | | | Total 9-12 | 284 | 302 |
| | | | Total K-12 | 946 | 1,007 |

^a Student generation rate for residential units based on multi-family residential unit rate from LAUSD School Facilities Needs Analysis, p.5, September 2012. Student generation rate for non-residential based on the average of office and retail/service student generation rates from LAUSD Commercial/Industrial Development School Fee Justification Study, p.19, September 27, 2010.

Source: PCR Services Corporation, March 2016.