

IV. Environmental Impact Analysis

K. Population and Housing

1. Introduction

This section identifies associated regulatory requirements, describes the existing population and housing on the Project Site, and evaluates potential effects of the Project's contribution to population, housing, and employment growth within the City of Los Angeles related to implementation of the proposed Project. This section provides a description of the recent and future population trends and projections in the Southern California Association of Governments (SCAG) Region and the City of Los Angeles. This section evaluates (a) the Project in the context of SCAG's population growth forecast for the SCAG region and the City of Los Angeles (City), and (b) the Project's impacts on housing demand individually and cumulatively.

2. Environmental Setting

a) Regulatory Framework

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

- Housing Element Law: California Government Code Section 65583 and 65584(a)(1)
- The Sustainable Communities and Climate Protection Act of 2008 (SB 375, Steinberg)
- SCAG
 - Regional Housing Needs Assessment (RHNA)
 - Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)
- Los Angeles General Plan Framework Element
- Los Angeles General Plan Housing Element
- Hollywood Community Plan

(1) State

(a) *Housing Element Law: California Government Code Section 65583 and 65584(a)(1)*

Section 65583 of the California Government Code requires cities and counties to prepare a housing element, as one of the State-mandated elements of the General Plan, with specific direction on its content. Pursuant to Section 65584(a)(1), the California Department of Housing and Community Development is responsible for determining the regional housing needs assessment (segmented by income levels) for each region's planning body known as a "council of governments" (COG), with SCAG being the COG serving the Southern California area. The California Department of Housing and Community Development prepares an initial housing needs assessment and then coordinates with each COG in order to arrive at the final regional housing needs assessment. To date, there have been four previous housing element update "cycles." California is now in its fifth "housing-element update cycle." The SCAG Regional Housing Needs Assessment (RHNA) and the Housing Element of the City's General Plan are discussed further below.

(b) *The Sustainable Communities and Climate Protection Act of 2008 (SB 375, Steinberg)*

Senate Bill (SB) 375 focuses on aligning transportation, housing, and other land uses to achieve regional greenhouse gas (GHG) emission reduction targets established under the California Global Warming Solutions Act, also known as Assembly Bill 32. SB 375 requires Metropolitan Planning Organizations to develop a Sustainable Communities Strategy (SCS) as part of the Regional Transportation Plan (RTP), with the purpose of identifying policies and strategies to reduce per-capita passenger vehicle-generated GHG emissions. As set forth in SB 375, the SCS must: (1) identify the general location of land uses, residential densities, and building intensities within the region; (2) identify areas within the region sufficient to house all the population of the region, including all economic segments of the population, over the course of the planning period; (3) identify areas within the region sufficient to house an 8-year projection of the regional housing need; (4) identify a transportation network to service the regional transportation needs; (5) gather and consider the best practically available scientific information regarding resource areas and farmland in the region; (6) consider the state housing goals; (7) establish the land use development pattern for the region that, when integrated with the transportation network and other transportation measures and policies, will reduce GHG emissions from automobiles and light-duty trucks to achieve GHG emission reduction targets set by the California Air Resources, if there is a feasible way to do so; and (8) comply with air quality requirements established under the Clean Air Act.

As noted above, the California Government Code requires local governments to adopt a housing element as part of their General Plan and update the housing element as frequently as needed and no less than every 5 years. Under SB 375, this time period has been lengthened to 8 years and timed so that the housing element period begins no less than 18 months after adoption of the RTP, to encourage closer coordination between housing and transportation planning. SB 375 also changes the implementation schedule required for each housing element. Previous law required the housing element to contain a program that set forth a 5-year schedule to implement the goals and objectives of the housing element. The new law instead requires that this schedule of actions occur during the 8-year housing element planning period, that each action have a timetable for implementation, and that the schedules for the RTP and RHNA processes be synchronized. SB 375 also requires the RHNA to allocate housing units within the region in a manner consistent with the development pattern adopted by the SCS.

As discussed further below, on September 3, 2020, SCAG adopted its 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS; Connect SoCal), which is an update to the previous 2016–2040 RTP/SCS.¹ Using growth forecasts and economic trends, the RTP/SCS provides a vision for transportation throughout the region for the next 25 years that achieves the statewide reduction targets, and in so doing, identifies the amount and location of growth expected to occur within the region.

(2) Regional

(a) SCAG

SCAG is the federally designated Metropolitan Planning Organization for six counties in Southern California: Ventura, Orange, San Bernardino, Riverside, Imperial, and Los Angeles. SCAG develops plans for transportation, growth management, and hazardous waste management, and develops a regional growth forecast that forms a foundation for its regional plans and regional air quality plans that are developed by the South Coast Air Quality Management District. SCAG prepares several plans to address regional growth, including the RHNA, the RTP, the Regional Transportation Improvement Program, and annual state of the region reports to measure progress toward achieving regional planning goals and objectives. SCAG plans that address population and housing are characterized below.

¹ Southern California Association of Governments (SCAG), 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal), 2020.

(i) RHNA

The RHNA is mandated by the California Government Code as part of a periodic process of updating local housing elements in city and county General Plans. The RHNA is produced by SCAG and contains a forecast of housing needs within each jurisdiction within the SCAG region for 8-year periods. The 5th Cycle RHNA Allocation Plan is the RHNA that was in effect when the Notice of Preparation was issued for the Project in September 2017. The 5th Cycle RHNA Allocation Plan covers the planning period of October 2013 through October 2021 and shows a need for 412,137 additional housing units within the SCAG region. Of the SCAG region's total allocation, the City of Los Angeles is assigned 82,002 units.² Once the RHNA is determined, local jurisdictions decide how to address their housing needs through the process of completing general plan housing elements.

At the time of drafting this Environmental Impact Report (EIR), the City, among all other jurisdictions within the SCAG region are required to update their respective housing elements to accommodate the 6th cycle of RHNA, which covers the planning period of October 2021 through October 2029. SCAG distributed the draft RHNA allocations based on the Final RHNA methodology on September 4, 2020. RHNA allocations will be finalized in approximately February 2021. Based on SCAG's determination of existing need and projected needs, which considers anticipated vacancies and projected household growth, the RHNA allocation to the City of Los Angeles is anticipated to be 455,577 units.³

For the purposes of this section of the Draft EIR, the impact analysis will focus on the 5th Cycle RHNA allocation for the City.

(ii) RTP/SCS

The 2020–2045 RTP/SCS (Connect SoCal) was adopted in September 2020 and presents the land use and transportation vision for the SCAG region through the year 2045, providing a long-term investment framework for addressing the region's challenges. The following are the 2020–2045 RTP/SCS goals: (1) encourage regional economic prosperity and global competitiveness; (2) improve mobility, accessibility, reliability, and travel safety for people and goods; (3) enhance the preservation, security, and resilience of the regional transportation system; (4) increase person and goods movement and travel choices within the transportation system; (5) reduce greenhouse gas emissions and improve air quality; (6) support healthy and equitable communities; (7) adapt to a changing climate and support an integrated regional development pattern and

² SCAG, 5th Cycle RHNA Final Allocation Plan 1/1/2014–10/1/2021, 2012.

³ SCAG, SCAG 6th Cycle Draft RHNA Allocation Based on RC-Approved Final RHNA Methodology 9/3/2020, 2020.

transportation network; (8) leverage new transportation technologies and data-driven solutions that result in more efficient travel; (9) encourage development of diverse housing types in areas that are supported by multiple transportation options; (10) promote conservation of natural and agricultural lands and restoration of habitats.

The 2020–2045 RTP/SCS recommends local jurisdictions accommodate future growth within existing urbanized areas, particularly near existing transit, to reduce vehicle miles traveled, congestion, and GHG emissions. Implementation of the RTP/SCS’s approaches to sustainably manage growth and transportation demand would reduce the distance and barriers between new housing, jobs, and services and reduce vehicle miles traveled and GHG emissions. Overall, the strategies and policies in the RTP/SCS are projected to exceed the GHG emission-reduction targets set forth by the California Air Resources Board under SB 375.⁴

(3) Local

(a) *Los Angeles General Plan Framework Element*

The City of Los Angeles General Plan Framework Element (Framework Element) establishes a Citywide context for long-term planning. The Framework Element was adopted in 1996 and was readopted in 2001. The Framework Element focuses on providing strategies that encourage growth in high-intensity commercial and mixed-used districts and industrial districts, particularly in proximity to transportation corridors and transit stations. However, the Framework Element provides that precise determinations regarding future growth and development will be made through the Community Planning process. As a result, the Framework Element encourages future growth and development within target areas but does not require that future development and growth be limited to the identified target areas.

Goals and objectives related to population, housing, and employment are listed below.⁵

Goal 7A: A vibrant economically revitalized City.

Objective 7.1: Focus available resources on a coordinated and comprehensive effort to promote economic activity in Los Angeles, including an aggressive marketing program that communicates the resources and assets available within the City.

⁴ SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, 2016.

⁵ City of Los Angeles, General Plan Framework Element, Chapters 4 and 7, 2001.

Goal 7B: A City with land appropriately and sufficiently designated to sustain a robust commercial and industrial base.

Objective 7.2: Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.

Goal 7C: A City with thriving and expanding businesses.

Objective 7.3: Maintain and enhance the existing businesses in the City.

Goal 7D: A City able to attract and maintain new land uses and businesses.

Objective 7.4: Improve the provision of governmental services, expedite the administrative processing of development applications, and minimize public and private development application costs.

Objective 7.5: Capture a significant share of regional growth in the "targeted" or emerging industries in the City of Los Angeles.

Objective 7.6: Maintain a viable retail base in the City to address changing resident and business shopping needs.

Goal 7E: A City with a highly qualified labor force.

Objective 7.7: Achieve an effective "match" between the qualifications of the local labor force and the anticipated personnel requirements of existing and emerging industries in the City.

Goal 7H: A distribution of economic opportunity throughout the City.

Objective 7.10: Program resources in a manner that encourages appropriate development, housing opportunities, transit service and employment generation in all areas of the City, with particular emphasis on those portions of the City which historically have not received a proportional share of such opportunities, consistent with the City's overall economic policies.

(b) *Los Angeles General Plan Housing Element*

The City of Los Angeles General Plan Housing Element (Housing Element) is the City's blueprint document for meeting housing and growth challenges for 2013–2021. It identifies the City's housing conditions and needs; reiterates goals, objectives, and policies that are the foundation of the City's housing and growth strategy; and provides an array of programs the City has committed to implement to create sustainable, mixed-

income neighborhoods across the City. The Housing Element begins with a detailed analysis of the City's demographic, economic, and housing characteristics. It also provides a review of the City's progress in implementing the previous Housing Element's housing policies and programs related to housing production and preservation. The 2013–2021 Housing Element was adopted in 2013 to update the previous 2006–2014 Housing Element. The City is in the process of drafting the 2021–2029 Updated Housing Element.⁶ Based on the needs (Chapter 1), constraints (Chapter 2), and opportunities (Chapter 4), the 2013–2021 Housing Element identifies goals, objectives, policies, and implementable programs that address the housing needs of present and future residents. The following are objectives and policies are furthered by the Project:

Objective 2.2: Promote sustainable neighborhoods that have mixed-income housing, jobs, amenities, services and transit.

Policy 2.2.3: Promote and facilitate a jobs/housing balance at a citywide level.

Policy 2.2.5: Provide sufficient services and amenities to support the planned population while preserving the neighborhood for those currently there.

Objective 2.4: Promote livable neighborhoods with a mix of housing types, quality design and a scale and character that respects unique residential neighborhoods in the City.

Policy 2.4.1: Promote preservation of neighborhood character in balance with facilitating new development.

Policy 2.4.3: Develop and implement sustainable design standards in public and private open space and street rights-of-way. Increase access to open space, parks and green spaces.

(c) *Hollywood Community Plan*

The Hollywood Community Plan provides an official guide to future development of the Community for the use of the City Council, the mayor, the City Planning Commission, other concerned government agencies, residents, property owners, community business people, and private organizations concerned with planning and civic betterment. The Hollywood Community Plan, adopted on December 13, 1988, was designed to accommodate anticipated growth in population and employment through 2010. The City's Planning Department is in the process of updating the Hollywood Community Plan and released a draft Community Plan and Draft EIR in November 2018. Until the Hollywood Community Plan update is approved, the 1988 Hollywood Community Plan is in effect.

⁶ City of Los Angeles, General Plan Housing Element 2013–2021, 2013.

The following Hollywood Community Plan goals and objectives are related to population and housing and are furthered by the Project:⁷

Objective 1: To coordinate the development of Hollywood with that of other parts of the City of Los Angeles and the metropolitan area.

To further the development of Hollywood as a major center of population, employment, retail services, and entertainment; and to perpetuate its image as the international center of the motion picture industry.

Objective 4: To promote economic well being and public convenience through:

- a. Allocating and distributing commercial lands for retail, service, and office facilities in quantities and patterns based on accepted planning principles and standards.
- b. Designating land for industrial development that can be so used without detriment to adjacent uses of other types, and imposing restrictions on the types and intensities of industrial uses as are necessary to this purpose.
- c. Encouraging the revitalization of the motion picture industry.
- d. Recognizing the existing concentration of medical facilities in East Hollywood as a center serving the medical needs of Los Angeles.

b) Existing Conditions

(1) Project Site

The proposed Project would expand the existing Kaiser Permanente Los Angeles Medical Center (Medical Center) campus by replacing facilities and adding new buildings. The term “Medical Center campus” refers to the entirety of the Kaiser Permanente facility, which is within a Unified Hospital Development boundary (see **Figure II-2**, Unified Hospital Development Boundary in Chapter II of this Draft EIR). The term “Project Site” and “Building Sites” refers to the properties on which the proposed redevelopment would occur, and are outlined in **Figure II-4**, Proposed Site Plan, in Chapter II of this Draft EIR as the “Proposed Project/Building Sites,” which include:

- Site 1: 1317, 1321, 1329, and 1345 North Vermont Avenue, 1328 North New Hampshire Avenue
- Site 2: 4760 Sunset Boulevard

⁷ City of Los Angeles Department of City Planning, Hollywood Community Plan, Adopted December 13, 1988.

- Site 3: 1505 North Edgemont Street
- Site 4: 1526 North Edgemont Street
- Site 5: 1517 North Vermont Avenue
- Site 6: 4950 West Sunset Boulevard

As detailed in Chapter II of this Draft EIR, Environmental Setting, the existing Medical Center campus consists of a 460-bed hospital, approximately 635,200 square feet of medical office space, and parking garages. With the exception of Site 1, all of the listed Building Sites are currently occupied with Kaiser Permanente facilities, including medical office buildings and associated surface parking and parking structures. Site 1 currently supports a commercial structure (previously a restaurant), a dental office complex, and a residential duplex, all of which are unoccupied.⁸ As such, the Project Site does not currently support a residential population.

(2) Existing Employees

Based on communication with the Los Angeles Medical Center Human Resources in 2018, the existing number of employees at the existing Medical Center campus is approximately 7,300 employees.⁹ The number of employees for the existing Medical Center is based on employees “service area” designation and not by location, meaning people physically located at the existing Medical Center are considered regional employees. Based on the approximately 635,200 square feet of medical office space, and parking garages within the existing Medical Center campus, the employee to building square foot ratio is approximately 1 employee to 1,000 square feet of building area.

(3) Regional Growth Forecast

As part of its RTP/SCS document, SCAG develops population, housing, and employment forecasts for the SCAG region and for the jurisdictions that make up the SCAG region. **Table IV.K-1** provides the 2017 Project baseline population, as well as growth projections for 2030 (Project buildout year) and 2045 (SCAG projection horizon of 2020–2045 RTP/SCS).

⁸ Certificate of Abandonment, December 30, 2016.

⁹ P. Martin, pers. comm. 2018, “Hospital Employees.” Email from P. Martin (Director of Human Resources, Kaiser Permanente - Los Angeles Medical Center) to Email from M. Hesse (Senior Project Manager, Los Angeles Medical Center Delivery Team), November 12, 2018.

TABLE IV.K-1
SCAG POPULATION AND HOUSING FORECASTS FOR THE CITY OF LOS ANGELES

	2030 (Project Buildout Year)				2045 (RTP/SCS Projection Horizon)		
	Project Baseline (2017) ¹	Projected	Total Growth	Percentage Increase as Compared to 2017	Projected	Total Growth	Percentage Increase as Compared to 2017
Population	3,962,679	4,338,110	375,431	9.5%	4,771,300	808,621	20.4%
Housing	1,381,690	1,572,655	190,966	13.8%	1,793,000	411,310	29.8%
Employment	1,858,217	1,987,141	128,924	6.9%	2,135,900	277,683	14.9%

SOURCE: SCAG, 2020–2045 RTP/SCS, Demographics and Growth Forecast Appendix, 2020.

NOTE:

¹ The 2017 baseline estimates were determined by interpolating the data presented in the SCAG projections based on values provided for 2016 and 2045. The 2017 estimate is calculated by: (2045 data - 2016 data/29 years) + 2016 data = 2017 baseline estimate. The 2030 estimate is calculated by: [(2045 data - 2016 data/29 years) * 14 years] + 2016 data = 2030 baseline estimate. The 2016 population, housing, and employment estimates are 3,933,800 people; 1,367,000 units; and 1,848,300 jobs, respectively.

(a) Population

As indicated in Table IV.K-1, the City population is expected to grow 375,431 people or 9.5 percent from the 2017 baseline year to 2030 (Project buildout year). By 2045, the horizon year of SCAG projections, the population is expected to increase in the City by 808,621 people or 20.4 percent.

(b) Housing

As indicated in Table IV.K-1, the number of households/occupied housing units in the City is expected to grow by 190,966 units or 13.8 percent from the 2017 baseline year to 2030 (Project buildout year). By 2045, the number of households in the City is expected to increase by 411,310 units or 29.8 percent.

(c) Employment

As indicated in Table IV.K-1, the number of employees in the City is expected to grow 128,924 employees or 6.9 percent from the 2017 baseline year to 2030 (Project buildout year). By 2045, the number of workers in the City is expected to increase by 277,683 workers or 14.9 percent.

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 population and housing if it would:

Threshold (a): Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure); or

Threshold (b): Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

This analysis relies upon the Appendix G thresholds. The analysis uses factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G threshold questions.

(1) Population and Housing Growth

- The degree to which the project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/ planned levels for the year of project occupancy/buildout, and that would result in an adverse physical change in the environment; or
- Whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and
- The extent to which growth would occur without implementation of the project.

(2) Population and Housing Displacement

- The total number of residential units to be demolished, converted to market rate, or removed through other means as a result of the proposed project, in terms of net loss of market-rate and affordable units; or
- The current and anticipated housing demand and supply of market rate and affordable housing units in the project area; or
- The land use and demographic characteristics of the project area and the appropriateness of housing in the area; and
- Whether the project is consistent with adopted City and regional housing policies.

b) Methodology

The focus of environmental analysis prepared under CEQA is a project's potential to cause effects on the physical environment. Accordingly, the State CEQA Guidelines state that while economic or social information may be included in an EIR, or may be presented in whatever form(s) the lead agency desires, social, and economic effects shall not be treated as significant effects on the environment.

Social and economic factors, however, are relevant to CEQA issues if economic and social changes result from a project's physical changes. For example, a project's direct and indirect population can be used to estimate the amount of natural resources, energy resources, and public services that might be consumed as a result of the project, and whether the resulting scale of use is "significant."

This analysis provides an assessment of the jobs and resulting population increase that would be generated by the Project, to gauge whether there could be possible physical impacts from substantial unplanned population growth. The Project's population and employment generation is assessed against the growth forecast for the City of Los Angeles as a whole to 2030 as previously shown in Table IV.K-1.

c) Project Design Features

No project design features are proposed with regard to population and housing.

d) Analysis of Project Impacts

Threshold (a): Would the project induce unplanned substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

(1) Impact Analysis

(a) Construction

The Project involves the demolition of existing structures and construction of medical office buildings, parking structures, and associated improvements. 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, if not 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 the Project Site on a temporary basis only and are therefore not likely to relocate their households

as a consequence of the construction job opportunities presented by the Project. As such, the construction employment generated by the Project would not result in a notable increase in the resident population and would not induce unplanned substantial population growth.

(b) Operation

The Project Site is located in a heavily urbanized area of Hollywood and is developed with existing medical office buildings, commercial buildings, a residential building, and surface parking uses. Development of the Project would connect to the existing uses and utilities on the Project Site. Accordingly, the Project does not involve the extension of roadways or infrastructure into an undeveloped area and would not indirectly induce substantial unplanned population growth.

The Project does not include a residential component and, therefore, would not directly generate population growth through the provision of housing. However, the Project would result in a net increase in square footage of nonresidential floor area, which would generate increased employment opportunities, which in turn could generate population growth. Therefore, this impacts analysis evaluates the employment growth that will be caused by the Project to determine whether it is within the SCAG growth projections. If the employment growth anticipated from implementation of the proposed Project does not exceed the SCAG employment forecast for the City of Los Angeles subregion, then the proposed Project would not have the potential to directly (through employment growth) cause substantial unplanned population growth.

As previously shown in **Table III-1** (see Chapter III, Project Description), the Project would result in a net increase in 570,462 square feet and 602,462 square feet in building and parking square footage under Option A and Option B, respectively. Based on communication with the Los Angeles Medical Center Service Delivery Team¹⁰ and the existing building square footage, the estimated employee to building square footage ratio is 3 employees per 1,000 square feet. Conservatively, using the larger net increase of 602,462 in building square footage under Option B, the Project would result in approximately 1,807 new employees under the 2030 buildout.

As previously shown in Table IV.K-1, the City is projected add 128,924 employees from the 2017 baseline year to 2030 (Project buildout year). As such, the Project's approximately 1,807 new employees would represent 1.4 percent of new employment projected in the City of Los Angeles SCAG subregion between 2017 and 2030 (Project buildout). Thus, the increase in employment anticipated with implementation of the proposed Project would not exceed the employment forecast provided by SCAG for the

¹⁰ Hesse, A0147: LAMC Aesthetics – Net Growth Staff Increase, 2019.

City of Los Angeles subregion. Further, the proposed Project is not expected to lead to a significant corresponding increase in population or households. Given the available labor pool in the City and the region,¹¹ a majority of these employees would not be expected to relocate to the area solely for the purpose of being close to the Project Site, thereby creating additional demand for housing in the Project Site area.

As such, the proposed Project would be consistent with the applicable growth projections of the 2020–2045 RTP/SCS and would not induce unplanned substantial population either directly due to employment growth, or indirectly due to the extension of roads or other infrastructure. Impacts would be less than significant.

(2) Mitigation Measures

Impacts related to unplanned population growth were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Impacts related to population were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impacts level remains less than significant.

Threshold (b): Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?¹²

(1) Impact Analysis

As discussed in Section VI.6, Effects Not Found to Be Significant, of this Draft EIR, and in the Initial Study (Appendix A-1), the Project would not displace substantial numbers of existing housing (one unoccupied duplex), necessitating the construction of replacement housing elsewhere. Thus, the Project would have no impact with respect to displacement of housing. **As such, the Project would not displace substantial number of existing people or housing, necessitating the construction of replacement housing elsewhere, and impacts respective to displacement would be less than significant.**

¹¹ Employment Development Department, Los Angeles-Long Beach-Glendale Metropolitan Division (Los Angeles County), 2011.

¹² Since the release of the Initial Study (September 2017), this threshold question (b) has been changed to discuss both the displacement of housing and people. In the Initial Study, Threshold (b) discussed displacement of housing and Threshold (c) discussed displacement of people, whereby Threshold (c) was determined to be a potentially significant impact. Although Threshold (b) was previously eliminated from further discussion in the EIR, a discussion of the potential to displace people is included herein.

(2) Mitigation Measures

Impacts related to the displacement of people or housing were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Impacts related to the displacement of people or housing 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

(a) Construction

The construction of the proposed Project and 85 related projects are anticipated to generate a number of skilled construction-related jobs during the construction phases. The work requirements of many construction projects are highly specialized so that construction workers remain at a job site only for the time frame in which their specific skills are needed to complete a particular phase of the construction process. As a result, construction workers typically work at several job sites within the region throughout the year and rotate from job site to job site. Therefore, most construction workers would not be expected to relocate their place of residence as a consequence of working on the proposed Project and related projects. As such, the Project's contribution to impacts associated with population growth due to temporary construction jobs would not be cumulatively considerable, and cumulative impacts would be less than significant.

(b) Operation

Cumulative impact analysis addresses the impacts of known and anticipated development in the Project Area. The 85 related projects are listed on **Table II-2** in Chapter II, Environmental Setting. The calculation of cumulative housing units, population, and employees attributable to the related projects are provided in Appendix J, Population and Housing Calculations. A summary of cumulative growth is shown in **Table IV.K-2**. Projections focus on the development from 2017 (Notice of Preparation year) to the 2045 horizon year. The 2045 horizon year is the appropriate time frame for evaluating cumulative impacts because the related projects represent a long-term development scenario for the City.

**TABLE IV.K-2
CUMULATIVE POPULATION, HOUSING, AND EMPLOYMENT**

	Cumulative Increase (Including Project)	Year 2045 Projected Growth	Cumulative Percentage of Growth
Population	30,441	808,621	3.8%
Housing Units	10,795	411,310	2.6%
Employment	45,476	277,683	16.0%

SOURCES: SCAG, 2020–2045 RTP/SCS, Demographics and Growth Forecast Appendix, (September 2020).

(i) Population

As shown in Table IV.K-2, Cumulative Population, Housing, and Employment, cumulative population growth under the Project and related projects would be 3.8 percent of the population growth estimated from the 2017 baseline year to 2045 horizon year.

(ii) Housing

As shown in Table IV.K-2, Cumulative Population, Housing, and Employment, related projects would result in the construction of approximately 10,795 dwelling units. Under the Project and related projects, the dwelling units would be 2.6 percent of the projected housing growth estimated from the 2017 baseline year to 2045 horizon year.

(iii) Employment

As shown in Table IV.K-2, Cumulative Population, Housing, and Employment, related projects would have approximately 43,669 opportunities in the City, while the Project would add 1,807 employment opportunities. Under the Project and related projects, the employment opportunities would represent approximately 16.4 percent of the projected new jobs from the 2017 baseline year to 2045 horizon year.

(iv) Conclusion

As noted above, the projected population, household, and employment growth would be within the 2045 SCAG projections for the City of Los Angeles subregion identified in the 2020–2045 RTP/SCS. As discussed above, the Project could generate approximately 1,807 new jobs. The Project would not contribute to additional population growth nor housing units. The addition of Project employment opportunities represents approximately 0.65 percent of the employment growth projected in the City of Los Angeles

between 2017 and 2045 horizon year. With the addition of employment opportunities from related Projects, the addition would represent 16.4 percent of the projected new jobs from the 2017 baseline year to 2045 horizon year. Thus, development of the Project would not contribute to a cumulatively considerable impact with the addition of related projects. Further, as discussed previously, the Project would not create unplanned growth through extension of roadways or infrastructure. **Therefore, the Project's contribution to cumulative population and housing impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(2) Mitigation Measures

Cumulative impacts related to population and housing were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Cumulative impacts related to population and housing 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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