

IV. Environmental Impact Analysis

G. Population and Housing

1. Introduction

This section evaluates the Project's potential impacts on population and housing based upon whether the Proposed Project would directly or indirectly induce substantial unplanned population growth and whether the Project would displace housing or people. Additionally, this Section evaluates the Proposed Project in relationship to the Southern California Association of Governments' (SCAG) population, housing, and employment growth forecasts for the City of Los Angeles subregion. The Proposed Project's effects on these demographic characteristics are compared to growth forecasts and applicable policies and programs regarding planning for future development. This Section also evaluates whether the Proposed Project would cause growth that exceeds planned growth for the City. This section also analyzes potential cumulative impacts related to population growth and housing needs. Cumulative calculations are provided in Appendix N of this Draft EIR.

2. Environmental Setting

The Project Site and surrounding area are within the scope of regional population and housing projections provided by SCAG, as well as local projections provided within the City of Los Angeles General Plan Framework Element.

a) Regulatory Framework

(1) Federal

(a) United States Census

The U.S. Census counts every resident in the United States. It is mandated by Article I, Section 2 of the Constitution and takes place every 10 years. The data collected by the decennial census determine the number of seats each state has in the U.S. House of Representatives and is used to distribute federal funds to local communities. The population of the United States was counted as 308,745,538 persons in the 2010 Census, representing a 9.7% increase from the prior recorded 2000 Census. Within the City of Los Angeles, the 2010 Census documented a population of 3,792,621 persons and 1,413,995

dwelling units within the City's boundaries. The U.S. Census also estimates the population and housing units every year for each city. The most recent demographic and housing estimates available (2017) for the City of Los Angeles estimates approximately 3,949,776 persons and 1,457,762 housing units for the year 2017. Based on the U.S. Census Bureau American Fact Finder database, there is an average of 2.42 persons per multi-family residential household.¹

(2) State

(a) *California Government Code Sections 65583 and 65584(a)(1)*

Section 65583 of the California Government Code requires cities and counties to prepare a housing element, as one of seven 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 (HCD) reviews every local government's housing element to determine whether it complies with state law. HCD 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), SCAG being the COG serving the Southern California area. HCD 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 Regional Housing Needs Assessment (RHNA) and the City's General Plan Housing Element are discussed further below.

(b) *Senate Bill 375 (SB 375, Steinberg) (Chapter 728, Statutes of 2008)*

Senate Bill 375 (Chapter 728, Statutes of 2008) (SB 375) established mechanisms for the development of regional targets for reducing greenhouse gas (GHG) emissions from passenger vehicles and light duty trucks. Under SB 375, the regional GHG reduction targets for the passenger vehicle and light-duty trucks guides the regional Metropolitan Planning Organization (MPOs) in the preparation of growth forecasts for population, households and employment. Under SB 375, the reduction target must be incorporated within that region's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). As discussed further below, on April 7, 2016, SCAG adopted its 2016-2040 RTP/SCS, which is an update to the previous 2012 RTP/SCS. Using growth forecasts and economic trends, the 2016-2040 RTP/SCS provides a vision for transportation

¹ *American Community Survey 5-Year Average Estimate (2013 – 2017) per correspondence with Jack Tsao, Los Angeles Department of City Planning Demographics Unit, July 31, 2019.*

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.

(3) Regional

(a) Southern California Association of Governments (SCAG)

SCAG is a federally designated Metropolitan Planning Organization (MPO) representing 6 counties (Ventura, Orange, San Bernardino, Riverside, Imperial, and Los Angeles). SCAG is mandated by federal and State law to research and prepare plans for transportation, growth management, hazardous waste management, and a regional growth forecast that is the foundation for these plans and for regional air quality plans developed by the South Coast Air Quality Management District (SCAQMD). Specifically, SCAG is responsible for preparing the Regional Transportation Plan (RTP) and RHNA, in coordination with other State and local agencies. SCAG divides its planning area into 15 subregions. The Project Site is located within the City of Los Angeles subregion, which includes all areas within the boundaries of the City. The City of Los Angeles subregion also includes the City of San Fernando and a portion of unincorporated Los Angeles County. However, the numbers discussed herein pertain to the City only. SCAG's Local Profiles Report 2019 for the City estimates 2018 population, housing, and employment numbers for the City. The report estimates that there were 4,059,665 residents, 1,382,970 total housing units, and 1,858,972 jobs in the City in 2018.²

On September 1, 2020, SCAG's Regional Council adopted an updated Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) known as the 2020–2045 RTP/SCS or Connect SoCal. As with the 2016–2020 RTP/SCS, the purpose of the 2020–2045 RTP/SCS is to meet the mobility needs of the six-county SCAG region over the subject planning period through a roadmap identifying sensible ways to expand transportation options, improve air quality and bolster Southern California long-term economic viability.³ The goals and policies of the 2020–2045 RTP/SCS are similar to, and consistent with, those of the 2016–2040 RTP/SCS. Hence, because the Proposed Project would be consistent with the 2016–2040 RTP/SCS as discussed later in this section, the Proposed Project would also be consistent with the 2020–2045 RTP/SCS.⁴

² Southern California Association of Governments, *Local Profiles Report 2019, Profile of the City of Los Angeles, May 2019*, website: <https://www.scag.ca.gov/Documents/LosAngeles.pdf>, accessed January 2020.

³ SCAG, *News Release: SCAG Regional Council Formally Adopts Connect SoCal, September 3, 2020*.

⁴ For example, the Proposed Project would be consistent with both the 2016–2040 RTP/SCS and the 2020–2045 RTP/SCS because it would increase urban density within an High Quality Transit Area (HQTA) located less than 0.5 miles from a planned Metro Purple light rail station and in close proximity

Because the 2020–2045 RTP/SCS was adopted by SCAG subsequent to both circulation of the Notice of Preparation (NOP) for the Project on February 20, 2019 and approval by LADOT of the Transportation Assessment for the Project on March 26, 2020, this section and the balance of this Draft EIR provided detailed analysis of Project consistency with the 2016–2040 RTP/SCS.

(i) 2016-2040 RTP/SCS

In April 2016, SCAG’s Regional Council adopted the 2016-2040 RTP/SCS: A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. The 2016-2040 RTP/SCS is the culmination of a multi-year effort involving stakeholders from across the SCAG Region. Also, as discussed in Section IV.E, Land Use and Planning, the 2016-2040 RTP/SCS contains baseline socioeconomic projections that are the basis for SCAG’s transportation planning, and the provision of services by other regional agencies. It includes projections of population, households, and employment forecasted for 2020, 2035, and 2040 at the regional, county, and local jurisdictional levels.

The 2016-2040 RTP/SCS balances the Southern California region’s future mobility and housing needs with economic, environmental, and public health goals. The 2016-2040 RTP/SCS identifies the amount of expected growth in the region and allocates the expected distribution of that growth. The distribution reflects goals cited in the 2016-2040 RTP/SCS:

- Aligning the plan investments and policies with improving regional economic development and competitiveness;
- Maximizing mobility and accessibility;
- Ensuring travel safety and reliability for all people and goods in the region;
- Preserving and ensuring a sustainable regional transportation system;
- Maximizing productivity of the transportation system;
- Protecting the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking);
- Actively encouraging and creating incentives for energy efficiency, where possible;

to more than a dozen bus routes, would include transit-oriented development, and would implement TDM, all of which would reduce the City’s per capita VMT and associated air emissions. Another example is that because the Proposed Project would be consistent with the City’s existing General Plan land use designation and zoning of the Project Site, it has been accounted for in the regional growth projections in both the 2016–2040 RTP/SCS and 2020–2045 RTP/SCS.

- Encouraging land use and growth patterns that facilitate transit and non-motorized transportation; and
- Maximizing the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.

SCAG's 2016-2040 RTP/SCS estimates the population of the City will increase to 4,609,400 residents by 2040.⁵ Housing in the City is estimated by SCAG to increase to 1,690,300 housing units by 2040.⁶ Employment in the City is estimated by SCAG to increase to 2,169,100 jobs by 2040.⁷ Furthermore, the population, households, and employment growth projections for the Project baseline year (2019) and Project buildout year (2023) are analyzed in this section. The growth projections for year 2019 and year 2023 were estimated by calculating the annual linear growth rate from SCAG's 2012 and 2040 planning period and utilizing that rate to estimate the population, housing, and employment projections for the year 2019 and 2023, respectively. SCAG's population, housing, and employment projections for the City of Los Angeles, Los Angeles County, and the SCAG region as a whole for 2019 and 2023 are further summarized in Table IV.G-1, below.

⁵ Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategies, Final Growth Forecast by Jurisdiction website: http://www.scag.ca.gov/Documents/2016_2040RTPSCS_FinalGrowthForecastbyJurisdiction.pdf, accessed April 2019.

⁶ Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategies, Final Growth Forecast by Jurisdiction website: http://www.scag.ca.gov/Documents/2016_2040RTPSCS_FinalGrowthForecastbyJurisdiction.pdf.

⁷ *Ibid.*

**Table IV.G-1
SCAG Population and Housing Projections for the
City of Los Angeles, Los Angeles County and the SCAG Region**

Population			
	2019	2023	%Growth (2019-2023)
Los Angeles City	4,036,475	4,145,604	2.70%
Los Angeles County	10,320,750	10,548,036	2.20%
SCAG Region	19,276,000	19,821,143	2.83%
Households			
	2019	2023	%Growth (2019-2023)
Los Angeles City	1,416,700	1,468,814	3.68%
Los Angeles County	3,429,250	3,527,679	2.87%
SCAG Region	6,266,750	6,484,893	3.48%
Employment			
	2019	2023	%Growth (2019-2023)
Los Angeles City	1,814,575	1,882,104	3.72%
Los Angeles County	4,491,000	4,631,000	3.12%
SCAG Region	8,048,000	8,395,429	4.32%
<i>Source: Southern California Association of Government, 2016-2040 RTP/SCS, Demographics and Growth Forecast Appendix, adopted April 2016. The estimated projections for 2019 and 2023 were estimated by calculating the linear growth rate per year from 2012 to 2040 projections in the 2016-2040 RTP/SCS and utilizing that rate to estimate the population, housing, and employment projections for the designated years above.⁸</i>			

(ii) *Regional Housing Needs Assessment (RHNA)*

The RHNA is mandated by State Housing Law (Health & Safety Code §§ 17910 *et seq.*) as part of the periodic process of updating local housing elements of the General Plan. The RHNA quantifies the need for housing within each jurisdiction during specified planning periods. The 5th Cycle RHNA Allocation Plan, which covers the planning period from January 2014 to October 2021, was adopted by the Regional Council on October 4, 2012. The State of California Department of Housing and Community Development, Division of Housing Policy Development (HCD), approved SCAG's adopted RHNA Plan upon finding it consistent with the 2012-2035 RTP/SCS in that the Final RHNA was developed concurrently with SCAG's development of the Integrated Growth Forecast.

⁸ *The linear growth rate was calculated by taking the difference in population, housing, or employment from 2012 and 2040 to calculate a linear growth rate (slope) per year (i.e. persons/year). Then applying that slope to calculate the estimated population, housing, or employment for the years 2019 and 2023. For example, SCAG estimates the City of Los Angeles population to be 3,845,500 persons in 2012 and 4,609,400 persons in 2040, resulting in 763,900 additional persons in a 28-year period. The annual growth rate results in approximately 27,282 persons per year.*

For the City of Los Angeles subregion, the RHNA apportioned a total of 82,002 dwelling units, consisting of 10,213 extremely low-income households, 10,213 very low-income households, 12,435 low-income households, 13,728 moderate-income households, and 35,412 above moderate-income (market rate) households. The City of Los Angeles subregion RHNA allocation represents one-fifth of the total SCAG RHNA.⁹ A summary of the City of Los Angeles RHNA Allocation is presented in Table IV.G-2, below.

Communities use the RHNA in land use planning, prioritizing local resource allocation, and in deciding how to address existing and future housing needs resulting from population, employment and household growth. The RHNA does not necessarily encourage or promote growth but rather allows communities to anticipate growth, so that collectively the region and subregion can grow in ways that enhance quality of life, improve access to jobs, promote transportation mobility, and addresses social equity and fair share housing needs.

Table IV.G-2
City of Los Angeles
Regional Housing Needs Assessment Allocation (2013-2021)

Income Category	% of Total	Number of Units
Extremely low-income households ($\leq 30\%$ AMI ^a)	12.5	10,213
Very low-income households (31-50% AMI)	12.5	10,213
Low income households (51-80% AMI)	15.2	12,435
Moderate income households (81-120% AMI)	16.8	13,728
Above moderate-income households ^b ($\geq 120\%$ AMI)	43.2	35,412
Total ^c	100.1	82,001
<i>Notes:</i> ^a AMI = Area Mean Income ^b Includes market-rate housing ^c Percentages add up to more than 100% due to rounding. Sources: SCAG, 5 th Cycle RHNA Allocation Plan October 2012 and City of Los Angeles, Housing Element of the General Plan (2013-2021), at Table 1.29.		

(4) Local

(a) City of Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework (Framework), adopted December 1996 (re-adopted August 2001), provides general guidance on land use issues for the entire City. It sets forth a Citywide comprehensive long-range growth strategy and defines Citywide policies regarding land use, housing, urban form, neighborhood design, open

⁹ City of Los Angeles, City of Los Angeles Housing Element (2013-2021), December 2013 (at page 1-79).

space and conservation, economic development, transportation, infrastructure, and public services. General Plan Framework land use policies are implemented at the community level through the City's Community Plans and Specific Plans. The Framework contains several housing goals for the City, as identified below.

- An adequate supply of housing accessible to persons of all income levels;
- Sufficient ownership and rental housing to meet the City's needs;
- Housing production incentives for for-profit and non-profit developers of housing for low- and very-low income households;
- A reduction in barriers leading to more housing;
- Housing opportunities accessible to all City residents without discrimination, including groups with special needs;
- A City of residential neighborhoods that maintains a sense of community by conserving and improving existing housing stock;
- Housing, jobs, and services in mutual proximity; and
- Energy efficient housing.

An analysis of the Proposed Project's compliance with the General Plan Framework Element is discussed in further detail in Section IV.E, Land Use and Planning of this Draft EIR.

(b) City of Los Angeles General Plan Housing Element

The Housing Element is required by California State law to be a component of every city's General Plan because housing needs are recognized as a State-wide concern. Pursuant to State law, the City's Housing Element must identify the City's housing needs, the sites that can accommodate these needs, and the policies and programs to assure that the housing units necessary to meet these needs can be provided. The primary goal of the Housing Element is to provide a range of housing opportunities for all income groups. Pursuant to California Government Code Section 65580 – 65589.9, the Housing Element is required to be updated every eight years in accordance with a specific schedule of dates established by the State.

Adopted in December 2013, the City of Los Angeles General Plan Housing Element covers the period from 2013 to 2021, and is the City's blueprint for meeting its housing and growth needs.¹⁰ The Housing Element identifies as its overall goal the creation of a

¹⁰ *City of Los Angeles, City of Los Angeles Housing Element (2013-2021), December 2013.*

city of livable and sustainable neighborhoods with a range of housing types and costs in mutual proximity to jobs, infrastructure, and services. The City will achieve this goal amidst a variety of governmental, infrastructure, and market constraints to residential development through aligning its actions in accordance with four detailed goals, each of which contain objectives, policies, and implementing programs. These goals embody the City's commitment to meeting housing needs. The four detailed goals are as follows:

- Goal 1: A City where housing production and preservation result in an adequate supply of ownership and rental housing that is safe, healthy, and affordable to people of all income levels, races, ages, and suitable for their various needs.
- Goal 2: A City in which housing helps to create safe, livable and sustainable neighborhoods.
- Goal 3: A City where there are housing opportunities for all without discrimination.
- Goal 4: A City committed to ending and preventing homelessness.

The Housing Element also contains several population and housing objectives for the City, as identified below.

- Objective 1.1 - Produce an adequate supply of rental and ownership housing in order to meet current and projected needs;
- Objective 1.2 - Preserve quality rental and ownership housing for households of all income levels and special needs;
- Objective 1.3 - Forecast and plan for changing housing needs over time in relation to production and preservation needs;
- Objective 1.4 - Reduce regulatory and procedural barriers to the production and preservation of housing at all income levels and needs;
- Objective 2.1 - Promote safety and health within neighborhoods;
- Objective 2.2 - Promote sustainable neighborhoods that have mixed-income housing, jobs, amenities, services, and transit;
- Objective 2.3 - Promote sustainable buildings, which minimize adverse effects on the environment and minimize the use of non-renewable resources;
- 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;

- Objective 2.5 - Promote a more equitable distribution of affordable housing opportunities throughout the City;
- Objective 3.1 - Ensure that housing opportunities are accessible to all residents without discrimination on the basis of race, ancestry, sex, national origin, color, religion, sexual orientation, marital status, familial status, age, disability (including HIV/AIDS), and student status.
- Objective 3.2 - Promote fair housing practices and accessibility among residents, community stakeholders and those involved in the production, preservation and operation of housing.
- Objective 4.1 - Provide an adequate supply of short-term and permanent housing and services throughout the City that are appropriate and meet the specific needs of all persons who are homeless or at risk of homelessness.
- Objective 4.2 - Promote outreach and education to homeless populations; residents; community stakeholders; health, social service and housing providers and funders; criminal justice system agencies; and, communities in which facilities and services may be located.¹¹

An analysis of the above-listed objectives as they relate to the Proposed Project is provided in Section IV.E, Land Use and Planning, of this Draft EIR.

(c) *Wilshire Community Plan Area*

State of California law requires the incorporation of a land use element within cities' general plans. The City divides its land use element into 35 Community Plans, which address land use goals, policies, and objectives within each of the 35 Community Plan areas. The City's Community Plans are intended to promote an arrangement of land uses, streets, and services, which would encourage and contribute to the economic, social, and physical health, safety, and welfare of the people who live and work in the community for specific geographic areas. The Community Plans are also intended to guide development in order to create a healthful and pleasing environment. The Community Plans coordinate development among the various communities of the City and adjacent municipalities in a fashion both beneficial and desirable to the residents of the community. Each community plan provides population and housing growth estimates for its Community Plan area. The Project Site is located within the Wilshire Community Plan area. The Wilshire Community Plan guides land uses on the Project Site and in the surrounding areas. A detailed

¹¹ *City of Los Angeles, City of Los Angeles Housing Element (2013-2021), December 2013.*

description of the Wilshire Community Plan area is provided in Section IV.E, Land Use and Planning of this Draft EIR.

Opportunities identified by the Wilshire Community Plan with respect to residential uses include:

- Preserving public transit access to employment centers within the Wilshire Community as well as to Hollywood, Central City, West Los Angeles, Westwood, Century City, and Santa Monica.
- Exploring potential for additional mixed-use commercial and residential boulevards, along Beverly, Olympic, Pico, Robertson, and La Cienega Boulevards, and along 3rd Street, Fairfax, Vermont and Western Avenues.¹²

Opportunities identified by the Wilshire Community Plan, with respect to commercial uses include:

- Supporting mixed-use development in Wilshire Center, along Beverly, Olympic, Pico, Robertson, and La Cienega Boulevards; and along 3rd Street, Fairfax, La Brea, Vermont, and Western Avenue, to encourage pedestrian activity, reduce traffic circulation and congestion, and invigorate commercial areas.
- Enhancing and preserving existing neighborhood commercial uses (e.g., furniture and general goods stores, ethnic restaurants, plant nurseries, resident hotels, etc.) along Beverly, Olympic, Pico, Robertson, and La Cienega Boulevards, and along 3rd Street, Fairfax, Vermont and Western Avenues.¹³

(5) Existing Conditions

(a) 2016-2040 RTP/SCS Growth Estimates

Based on the regional growth projections in the 2016-2040 RTP/SCS, in 2012, the City had an estimated permanent population of approximately 3,845,500 persons, approximately 1,325,500 dwelling units, and 1,696,400 jobs.¹⁴ By the year 2040, SCAG forecasts that the City will increase to 4,609,400 persons (an approximate 20-percent increase from 2012) with approximately 1,690,300 dwelling units (an approximate 28-percent increase from 2012) and approximately 2,169,100 jobs (an approximate 28-

¹² City of Los Angeles, Department of City Planning, *Wilshire Community Plan*, September 19, 2001, pg. I-6.

¹³ City of Los Angeles, Department of City Planning, *Wilshire Community Plan*, September 19, 2001, pg. I-6.

¹⁴ Southern California Association of Government, *2016-2040 RTP/SCS, Demographics and Growth Forecast Appendix*, adopted April 2016.

percent increase 2012).¹⁵ Furthermore, the population, households, and employment growth projections for the Project baseline year (2019) and Project buildout year (2023) are analyzed in this section. The growth projections for year 2019 and year 2023 were estimated by calculating the annual linear growth rate from SCAG's 2012 and 2040 planning period and utilizing that rate to estimate the population, housing, and employment projections for the year 2019 and 2023, respectively. SCAG's population, housing, and employment projections for the City of Los Angeles, Los Angeles County, and the SCAG region as a whole for 2019 and 2023 are further summarized in Table IV.G-1, above.

(b) Existing Development Site Conditions

The Development Site does not contain any existing on-site housing units and, therefore, does not have any on-site residents. The Development Site is developed within a portion of the Project Site, and consists of approximately 151,048 square feet of commercial retail land uses, and a surface parking lot. The existing land uses within the Development Site boundaries, limited to the eastern portion of the Project Site, include the patio shops east, comprised of 19,175 square feet of retail land uses (including 13,090 square feet of general retail space and 6,085 square feet of restaurant space) and an approximately 131,873 square foot K-Mart retail store. An outdoor patio exists within the Development Site boundaries between the existing commercial structures on the western portion of the Project Site and the existing commercial structures on the Development Site. The remainder of the Development Site is an asphalt paved surface parking lot. As summarized in Table IV.G-3, Estimated Existing Employment on the Development Site, below, based on the size and type of existing retail land uses, the Development Site is estimated to generate approximately 314 employees.

¹⁵ *Southern California Association of Government, 2016-2040 RTP/SCS, Demographics and Growth Forecast Appendix, adopted April 2016.*

**Table IV.G-3
Estimated Existing Employment on the Development Site**

Type of Development	Size (square feet)	Employee Generation Factor ^a	Estimated Employees
Community Retail	144,963	2 employees / 1,000 sf	290
Restaurant High Turnover (Sit Down)	6,085	4 employees / 1,000 sf	24
Total	151,048		314
<i>Notes:</i> <i>sf = square feet</i> ^a <i>Employment rate is based on the City of Los Angeles VMT Calculator Documentation, Table 1: Land Use and Trip Generation Base Assumptions, November 2019.</i> <i>Source: Parker Environmental Consultants, 2020.</i>			

3. Environmental Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to population and housing if it would:

Threshold a) *Would the project 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)?*

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

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions. The factors listed below are not thresholds of significance. The Thresholds Guide identifies the following factors to evaluate population and housing on a case-by-case basis:

- **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; and

- Whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan;
- The extent to which growth would occur without implementation of the project.
- ***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;
 - The current and anticipated housing demand and supply of market rate and affordable housing units in the project area;
 - The land use and demographics 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 such as the Framework and Housing Elements, HUD Consolidated Plan and CHAS policies, redevelopment plan, RSO, and the Regional Comprehensive Plan and Guide (RCP&G).

b) Methodology

This analysis provides an assessment of the population that would be generated by the Proposed Project in comparison with regional growth forecasts. The population and housing impacts of the Proposed Project are determined based on the estimated number of dwelling units proposed and the number of people who would occupy the Proposed Project residential units. The Proposed Project's population increase is then compared to the citywide population projections for the City from SCAG's 2016–2040 RTP/SCS. The population growth associated with the Proposed Project is then evaluated against the applicable thresholds of significance as identified above.

For purposes of evaluating housing impacts, the Proposed Project's housing demand is compared to SCAG's household projections for the City's subregion. The Proposed Project's housing increase is also evaluated against other applicable City and regional housing goals, objectives and policies and other CEQA significance thresholds as identified above.

The Proposed Project's residential population was calculated based on the Citywide Person Per Household Factor for multi-family units, i.e., 2.42 people per unit. Use of this Citywide factor is appropriate for gauging growth within the City overall in order to compare Citywide development with SCAG regional and sub-regional growth projections. The average takes into account larger household sizes in some areas and of the City and smaller household sizes in other areas. Given the Proposed Project's location in the Wilshire Community Plan, and its smaller mix of unit sizes, the Proposed Project's population would be similar to or likely lower than the Citywide estimate. Therefore, population-related impacts on local services would be less when calculated under the expected smaller household size.

The analysis presented below also provides an assessment of the jobs that would be displaced and/or generated by the Proposed Project for purposes of determining whether physical impacts upon the environment would result.¹⁶ According to the State CEQA Guidelines, 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.¹⁷ The number of employees was calculated using employee projections provided by the Applicant and utilizing employee generation factors developed for a range of land uses by LADOT in its City of Los Angeles VMT Calculator Documentation (November 2019).

The Proposed Project's direct employment impacts are compared to SCAG's current employment growth projections for the City and for the Project Site.

c) Project Design Features

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

d) Analysis of Project Impacts

Threshold (a): Would the project 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)?

¹⁶ *Environment means the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise and objects of historic or aesthetic significance (P.R.C. Section 21060.5)*

¹⁷ *See CEQA Guidelines Section 15131(a) and 15064(e).*

(1) Construction

The Proposed Project is anticipated to increase the demand for skilled construction-related jobs during its construction. Based on statistics maintained by the U.S. Department of Labor, Bureau of Labor Statistics, there were a reported 222,500 construction related jobs in the Los Angeles subregion as of April 2020.¹⁸ Construction of the Proposed Project would result in increased employment opportunities in the construction field, which could potentially result in increased permanent population and demand for housing in the vicinity of the Project Site. However, the employment patterns of construction workers in Southern California are such that it is not likely that they would relocate their households as a consequence of the construction employment associated with the Proposed Project. The construction industry differs from most other sectors in several ways:

- There is no regular place of work. Construction workers regularly commute to job sites that change many times over the course of a year. Their sometimes-lengthy daily commutes are facilitated by the off-peak starting and ending times of the typical construction workday.
- 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 as dictated by the demand for their skills.

As a result, it is likely that the skilled workers anticipated to work on the Proposed Project already reside within the region and would not need to relocate as a result of employment. Furthermore, construction activity associated with the Proposed Project would not 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 nor result in an adverse physical change in the environment. It is estimated that the Proposed Project would generate approximately 300 jobs during the approximate 32-month construction schedule.¹⁹ Overall, construction employment related to the Proposed Project would be temporary and would not induce substantial permanent population growth or exceed expected growth for the area. **Therefore, the Proposed Project's construction activities would not induce substantial unplanned**

¹⁸ U.S. Department of Labor Statistics, *Los Angeles Area Economic Summary*, June 4, 2020.

¹⁹ This estimate is based on the building construction and vendor trip estimates in the Air Quality worksheets provided in Appendix C to this Draft EIR. The building construction and vendor trip estimates provided by CalEEMod are based on the amount of equipment estimated per phase and a 2008 SCAQMD Field Survey - SCAQMD 2010 update.

population growth in the Project area, either directly or indirectly. Accordingly, population and housing impacts associated with population growth due to temporary construction jobs would be less than significant.

(2) Operation

(a) Population

The Proposed Project includes the demolition of 151,048 square feet of existing commercial retail space and the construction of a mixed-use project with up to 331 multi-family dwelling units and 83,994 square feet of new commercial retail land uses. The proposed residential units would include 70 studio units, 162 1-bedroom units, 66 2-bedroom units, and 33 3-bedroom units.

As summarized in Table IV.G-4, based on Citywide demographic data for multi-family residential land uses data, the Proposed Project's 331 dwelling units would generate a resident population of 801 persons.²⁰

**Table IV.G-4
Proposed Project Housing and Population Estimates**

Land Use	Dwelling Units	Occupancy Rate (persons per unit) ^a	Resident Population
Multi-Family Residential	331	2.42/du	801

Source: Based on the American Community Survey (ACS) Public Use Microdata Sample (PUMS) data the City of Los Angeles citywide average population for multifamily housing is estimated to be 2.42 persons per household. (Jack Tsao, Department of City Planning Demographic Unit, July 31 2019).

Based on the estimated growth rate projections calculated from the SCAG's 2016-2040 RTP/SCS, it is estimated that the City's population in 2019 is 4,036,475 persons. The Citywide population is estimated to increase to 4,145,604 persons by 2023, as shown in Table IV.G-1 above, with an approximate 109,128 additional persons compared to the estimated population in 2019. The Proposed Project's estimated 801 future residents represent approximately 0.73 percent of the total population growth anticipated to occur within the City between 2019 and 2023. In addition, the 801 new residents (which is less than one percent of planned growth) that would be generated by the Proposed Project is considered planned growth because it is well within SCAG's population growth

²⁰ This estimate is based on the U.S. Census Bureau, American Community Survey (ACS) Public Use Microdata Sample (PUMS) database. The City of Los Angeles citywide average population for multifamily housing is estimated to be 2.42 persons per household. (Jack Tsao, Department of City Planning Demographic Unit, July 31, 2019).

projections for the City. Also, the Project Site is currently zoned to permit residential and commercial development, among a variety of other uses that are permissible uses. Therefore, the Proposed Project's residential population is well within the projected growth anticipated for the Project Site and the City's growth patterns. Thus, this growth is planned and would not represent unplanned or substantial growth beyond that otherwise forecasted for the region. Therefore, the Proposed Project's population growth is accounted for in the Citywide and regional population projections. ***The Proposed Project would result in a less-than-significant impact related to population growth in the City.***

(b) *Housing*

The Development Site is currently developed with commercial buildings and a surface parking lot, and does not include residential units.

As shown in Table IV.G-6, estimates extrapolated from SCAG data project the Citywide housing supply to increase by 52,114 units between 2019 and 2023, and by 273,600 units between 2019 and 2040. The 331 housing units proposed would be within the growth anticipated based on SCAG projections, representing approximately 0.64 percent of the Citywide total housing growth for the period of 2019 to 2023, and approximately 0.12 percent of the Citywide total growth for the period of 2019 to 2040. Therefore, the Proposed Project would be within SCAG's citywide projections for housing unit growth. The Proposed Project would therefore be considered planned growth that does not exceed the housing growth estimates for 2023 for the City. Furthermore, as discussed below, the Project would be consistent with the growth pattern envisioned in local and regional plans, within an infill location that has existing zoning and land use designations that accommodate the proposed housing stock. ***As such, impacts related to housing growth would be less than significant.***

(c) *Infrastructure*

The Proposed Project would not induce substantial population growth by introducing unplanned infrastructure or accelerating development in an undeveloped area. The proposed uses are compatible with the land uses within the Wilshire Community Plan area and the Proposed Project does not involve the extension of roadways or infrastructure. As discussed in Section IV.L, Utilities and Service Systems, of this Draft EIR, the Proposed Project is an infill project and would not require additional infrastructure related to water, wastewater, or solid waste and would be adequately served by existing utilities. As the Proposed Project would be supported by the existing infrastructure, indirect population growth impacts related to infrastructure improvements would be less than significant.

(d) *Employment*

As shown in Table IV.G-5, below, the land uses proposed as part of the Proposed Project are estimated to generate approximately 319 new employees on-site. Currently, the commercial uses permitted on the Development Site, and existing buildings could employ approximately 314 employees. These buildings are proposed for demolition as part of the Proposed Project. Therefore, the Proposed Project would result in a net increase in job capacity of approximately five jobs.

**Table IV.G-5
Estimated Employee Generation**

Land Use	Quantity Proposed	Employment Generation Rates ^a	Total Employees
Existing Uses to be Demolished			
Community Retail	144,963 sf	2 employees / 1,000 sf	290
Restaurant	6,085 sf	4 employees / 1,000 sf	24
Subtotal	151,048 sf		314
Proposed Project			
Commercial Retail	13,412 sf	2 employees / 1,000 sf	27
Restaurant	7,500 sf	4 employees / 1,000 sf	30
Supermarket	63,082 sf	4 employees / 1,000 sf	252
Residential	343,000 sf (311 DU)	NA ^b	10
Subtotal	426,994 sf		319
<i>Less Existing Employees</i>			-314
Net Total Employees			5
Notes:			
^a Employment rates based on LADOT's City of Los Angeles VMT Calculator Documentation, Table 1: Land Use and Trip Generation Base Assumptions, November 2019.			
^b Estimate for jobs generated by the residential operations is based on applicant provided data.			
Source: Parker Environmental Consultants, 2020.			

As shown in Table IV.G-1, it is estimated that the City's employment would increase to 1,882,104 total jobs by 2023. This would result in approximately 67,529 additional jobs compared to the estimated employment in 2019. The overall net change in the number of employees on the Project Site would increase by five employees. Thus, the Proposed Project would not induce substantial unplanned population growth in an area either directly or indirectly during its operation. **Therefore, the Proposed Project's impacts to employment growth would be less than significant.**

(e) *Consistency with Adopted Plans and Policies*

As discussed above, the Proposed Project would be consistent with the estimated population, housing, and employment growth projections for the year 2023 utilizing the growth rates of the 2016-2040 RTP/SCS for the City of Los Angeles and the SCAG Region. The 2016-2040 RTP/SCS encourages compact growth in areas accessible to transit and jobs, as well as housing closer to transit. The Proposed Project would provide housing and jobs in a High Quality Transit Area (HQTAs)²¹ that is adequately served by transit and in close proximity to employment centers and services. The Proposed Project further promotes the connectivity of the Project Site to the surrounding neighborhood area by providing on-site bicycle storage areas for Project residents and guests to facilitate and encourage alternative modes of transit. The Proposed Project would be consistent with the growth strategies, goals, and policies of the 2016-2040 RTP/SCS. (Refer to Appendix M of this Draft EIR, for a more detailed consistency analysis with the 2016-2040 RTP/SCS.) Furthermore, since the goals and policies of the 2020–2045 RTP/SCS are similar to, and consistent with, those of the 2016–2040 RTP/SCS, the Proposed Project would also be consistent with the 2020–2045 RTP/SCS.

The increased housing stock generated by the Proposed Project would help the City address the housing crisis identified by the General Plan Housing Element and the City's RHNA. The Proposed Project would provide 331 dwelling units, and offers various housing options ranging in size from studio to three-bedrooms that would be available to both families and individuals. The Project would be consistent with the General Plan's Framework Element and the General Plan Housing Element, which promotes the adequate supply of housing in proximity to jobs, amenities, services and transit. Additionally, the Proposed Project would activate a site that currently contains aging commercial buildings and a surface parking lot by providing new residential uses and neighborhood-serving commercial and retail space.

The Proposed Project's dwelling units would include a mix of studio, one-bedroom, two-bedroom, and three-bedroom units. This unit mix would diversify the City of Los Angeles' housing stock and increase housing opportunities in the Community Planning area and within the City. Further, the Proposed Project would be consistent with the Wilshire Community Plan's objective to reduce vehicular trips and congestion by developing new housing in close proximity to regional and community commercial centers, such as The Grove and the Original Farmers Market, future Metro rail and existing bus stops. (Metro Rapid bus line 780, located on S. Fairfax Avenue; and Metro local bus lines 16 and 316, located on W. 3rd Street. Other Metro local bus lines not defined as a major transit stops

²¹ SCAG defines a High Quality Transit Areas (HQTAs) as follows: "areas within one-half mile of a fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during peak commuting hours."

include: Metro Lines 217, 218, and 17; and LADOT DASH Fairfax). Additionally, the Proposed Project includes transportation demand strategies that reduce VMT, including unbundled parking, promotions and marketing, and bike parking per the LAMC. These strategies, which are discussed in Section I, Transportation, are consistent with the type of measures allowed by LADOT to reduce VMT.

Furthermore, the Proposed Project's mixed uses are encouraged by the Wilshire Community Plan. (Refer to Section IV.E, Land use and Planning of this Draft EIR, for a more detailed consistency analysis with the Wilshire Community Plan.) ***As such, the Proposed Project would be consistent with the applicable growth projections of the 2016-2040 RTP/SCS and with the goals and policies of the General Plan's Housing Element, Framework Element, Wilshire Community Plan, and 2016-2040 RTP/SCS. Therefore, in summary, the Proposed Project would not induce substantial unplanned population growth, either directly or indirectly, in the area and impacts are less than significant.***

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

As discussed in the Initial Study (See Appendix A to this Draft EIR), the Proposed Project would include the demolition of the existing surface parking lot and commercial buildings and would not displace any residents or housing units that would necessitate the construction of replacement housing elsewhere. ***Therefore, the Proposed Project would have no impact with respect to Threshold (b), and no further analysis is required.***

(3) Cumulative Impacts

In accordance with Section 15130(a), the analysis below addresses the cumulative impacts of the Proposed Project upon population, housing and employment. An impact is considered "cumulatively considerable" when the incremental impacts of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. (CEQA Guidelines §15065(a)(3)). An adequate discussion of a project's significant cumulative impact, in combination with other closely related projects, can be based on either: (1) a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in an adopted local, regional, statewide plan, or related planning document that describes conditions contributing to the cumulative effect.²² (CEQA Guidelines §15130(b)(1)(A)-(B)). The lead agency may also blend the

²² CEQA Guidelines §15130(b)(1)(A)-(B).

"list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence. The cumulative impact analysis employs a blended approach, evaluating growth projections of the 2016-2040 RTP/SCS, applicable General Plan and Wilshire Community Plan policies, and the cumulative growth generated by other known projects within the vicinity of the Project Site to determine the Proposed Project's contributing effect on potential cumulative impacts.

(a) *Construction*

The construction of the Proposed Project, in addition to the 63 related projects identified in the Transportation Study²³, 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, a substantial number of new permanent residents would not be generated as a result of the construction of the Proposed Project and related projects, and cumulative impacts associated with population growth due to temporary construction jobs would be less than significant.**

(b) *Operation*

(i) *Population and Housing Growth*

Of the 63 related projects, 51 related projects would introduce new housing developments that would have the potential to generate additional population growth within the SCAG region. Of the 51 related projects with housing developments, 33 of those related projects are located within the City of Los Angeles, and 18 related projects are located within the City of West Hollywood. The related projects would propose 2,686 apartments, 230 condominiums, 13 townhomes, and 8 single-family homes for a total of 2,937 total dwelling units proposed within the areas of the City and the City of West Hollywood that could have incremental impacts on increased population and housing within the SCAG region when considered together with the Proposed Project. These related projects and the Proposed Project would increase the total number of dwelling units and population to the SCAG Region. As shown in Table IV.G-6, below, the Proposed Project and related

²³ Linscott, Law & Greenspan, Engineers; Transportation Impact Study, 6300 W. 3rd Street Mixed-Use Project, City of Los Angeles, California, May 21, 2019.

projects within the SCAG Region would generate a combined 3,268 residential dwelling units and a residential population of approximately 7,909 persons. Based on this estimate, the Proposed Project's cumulative contribution to the housing and population growth would be within the growth projections of the SCAG Region as a whole.

Similar to the Proposed Project, a majority of the related projects are infill development in an already urbanized area, near existing employers, housing, and retail destinations, and are also consistent with the 2016-2040 RTP/SCS' focus on integrated land use planning. Additionally, a majority of the related projects are located in SCAG-designated HQTAs. The 2016-2040 RTP/SCS forecasts that these areas, while comprising only 3.0 percent of land area in the region, will make up 46 percent of future household growth and 55 percent of future job growth. The Proposed Project and the cumulative projects are consistent with these anticipated growth patterns.

Also, the City's Framework Element focuses on providing strategies for accommodating growth by encouraging growth in a number of higher-intensity commercial and mixed use districts, centers, boulevards and industrial districts particularly in proximity to transportation corridors and transit stations, while Community Plan policies call for developing new housing in a manner that reduces vehicle trips and makes services and facilities accessible to residents, by encouraging the development of multi-residential land uses in commercial zones. Many of the cumulative projects are consistent with these City plans.

As infill development, none of the cumulative projects includes development of any new facilities (i.e., roadways, new sources of water or energy supplies, airports, etc.) that may encourage or facilitate unplanned population growth.

The Proposed Project would thus not make a cumulatively considerable incremental contribution to a significant cumulative effect. ***Therefore, the Proposed Project's contribution to a cumulative housing and population impact would be less than significant.***

**Table IV.G-6
Estimated Cumulative Population and Housing Growth**

Use	Total Housing Units	SCAG Estimated Housing Increase Between 2019-2023	Total Population	SCAG Estimated Population Increase Between 2019-2023
Apartments	2,686		6,500	
Condominiums	230		557	
Townhomes	13		31	
Single Family Homes	8		19	
Total Related Projects:	2,937		7,108	
Proposed Project:	331		801	
NetTotal Growth:	3,268	52,114	7,909	109,129
<i>Source: Based on ACS PUMS data the City of Los Angeles citywide average population for multifamily housing is estimated to be 2.42 persons per household. (Jack Tsao, Department of City Planning Demographic Unit, July 31 2019). As a conservative estimate, the 2.42 pph rate was applied for dwelling units in West Hollywood. Cumulative calculations are provided in Appendix N of this Draft EIR.</i>				

(ii) *Employment*

Of the 63 related projects identified within the study area, 48 related projects would introduce new commercial developments that would generate additional employment growth within the City of Los Angeles and the City of West Hollywood. As shown in Table IV.G-7, below, the Proposed Project and related projects within the SCAG Region would generate an estimated 3,808 new employees which would be well within the proposed increase of 67,529 jobs between 2018 and 2023 within the SCAG region. Further, the Proposed Project would not have a cumulative contribution to regional employment growth, as the Proposed Project would result in a net increase of five jobs as compared to existing conditions. The Proposed Project would thus not make a cumulatively considerable incremental contribution to a significant cumulative effect. ***Therefore, the Proposed Project's contribution to a cumulative employment impact would be less than significant.***

**Table IV.G-7
Estimated Cumulative Employment Growth**

Land Use	Quantity	Employment Generation Rate^a	Total Employees
Retail	347,184 sf	2 employees / 1,000 sf	695
Medical Office	160,462 sf	3 employees / 1,000 sf	481
General Office	232,340 sf	4 employees / 1,000 sf	929
Gym/Health Club	14,000 sf	1 employee / 1,000 sf	14
Grocery/Supermarket	52,685 sf	4 employees / 1,000 sf	211
Hotel	341 rooms	0.5 employees / room	171
Church/Synagogue	16,582 sf	-- ^b	19
Hospital/Assisted Living	283 beds	1.85 employees / bed	524
Museum	135 emp	--	135
Restaurant	80,945 sf	4 employees / 1,000 sf	324
Total Related Projects:	--		3,484
Proposed Project:	83,994 sf	--	319
Net Total Growth:	--		3,808

^a Employment rates based on LADOT's City of Los Angeles VMT Calculator Documentation, Table 1: Land Use and Trip Generation Base Assumptions, November 2019. Cumulative calculations are provided in Appendix N of this Draft EIR.

^b The total employment generation for church/synagogue uses is based on the environmental documents on file with the City of Los Angeles, Department of City Planning for Related Project No. LA 17 (ENV-2018-1651-MND and Related Project No. LA 27 (ENV-2019-1857-EIR). Parker Environmental Consultants, 2020.

(4) Mitigation Measures

Project-level and cumulative impacts related to population, housing, and employment would be less than significant. Therefore, no mitigation measures would be required.

(5) Level of Significance After Mitigation

Project-level and cumulative impacts related to population, housing, and employment 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.