

IV. Environmental Impact Analysis

H. Population and Housing

1. Introduction

This section of the Draft EIR analyzes the Project's potential impacts on population and housing. Data regarding population and housing for the Southern California Associations of Governments (SCAG) region and the City of Los Angeles (City) were obtained from SCAG and U.S. Census data, as discussed further below.

2. Environmental Setting

a. Regulatory Framework

(1) Regional

SCAG is the federally designated Metropolitan Planning Organization for six Southern California counties (Ventura, Orange, San Bernardino, Riverside, Imperial, and Los Angeles). SCAG is responsible for developing plans for transportation, growth management, hazardous waste management, and a regional growth forecast that is a foundation for these plans and the regional air quality plans developed by the South Coast Air Quality Management District. SCAG prepares several plans to address regional growth, including the 5th Cycle Regional Housing Needs Assessment (RHNA), 2016–2040 and 2020–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and associated regional growth forecasts. SCAG's plans that address population and housing are discussed below.

(a) 5th Cycle Regional Housing Needs Assessment

The RHNA is a key tool for SCAG and its member governments to plan for growth. Its purpose is to quantify and allocate housing needs to each of SCAG's member jurisdictions by level of household income. The 5th Cycle RHNA Allocation Plan quantifies the need for housing within each of SCAG's member jurisdictions from the planning period of October 2013 to October 2021 (SCAG is currently working on a 6th Cycle RHNA that will

cover the planning period from October 2021 through October 2029).¹ The 6th Cycle RHNA is planned for adoption by SCAG in October 2020, thus the 5th Cycle RHNA remains in effect and applies here because it was in effect at the time the City started environmental analysis for the Project and published an Initial Study in March 2019. As discussed further below, the RHNA assigned 82,002 new units to the City for the October 1, 2013, through October 1, 2021, planning period, or an average of about 10,250 new units per year.² Communities then plan, consider, and decide how they will address this need through the process of completing the housing elements of their general plans. In 2018, the City issued 80,670 residential permits, including 4,265 permits for very low-income housing, 2,588 permits for low income housing, 430 permits for moderate income housing, and 73,387 permits for above moderate-income housing.³ The RHNA is produced periodically by SCAG, as mandated by state law, to coincide with the region's schedule for preparing housing elements. It consists of two measurements of housing need: (a) existing need and (b) future need.

(b) SCAG Regional Growth Forecasts

SCAG is responsible for producing socioeconomic forecasts and developing, refining, and maintaining macro and small-scale forecasting models. These forecasts are developed in close consultation with a Technical Advisory Committee comprised of local government and other public agencies, the California Department of Finance, County Transportation Commissions, and other major stakeholders. The forecasts are developed in five-year increments and are relied upon for preparation of SCAG's RTP/SCS, Air Quality Management Plan, and RHNA. Consistency with the growth forecast at the subregion level is one criterion that SCAG uses in exercising its federal mandate to review "regionally significant" development projects for conformity with regional plans.

(c) SCAG RTP/SCS

On September 1, 2020, SCAG's Regional Council adopted an updated RTP/SCS known as the 2020–2045 RTP/SCS or Connect SoCal.⁴ 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

¹ SCAG, *Regional Housing Needs Assessment (RHNA) & Housing web page*, www.scag.ca.gov/programs/pages/housing.aspx, accessed December 4, 2019.

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

³ Department of Housing and Community Development, *RHNA, Annual Progress Reports, 5th Cycle Annual Progress Report Permit Summary, APR Form CY 2018 and 2019 tab*, www.hcd.ca.gov/community-development/housing-element/index.shtml#annual, accessed August 28, 2020.

⁴ SCAG, *News Release: SCAG Regional Council Formally Adopts Connect SoCal*, September 3, 2020.

long-term economic viability.⁵ 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 Project would be consistent with the 2016–2020 RTP/SCS as discussed later in this section, the Project would also be consistent with the 2020–2045 RTP/SCS.⁶ Because the 2020–2045 RTP/SCS was adopted by SCAG subsequent to circulation of the Notice of Preparation (NOP) for the Project on March 29, 2019, this section and the balance of this Draft EIR provide detailed analysis of Project consistency with the 2016–2020 RTP/SCS.

(2) 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 at the City and community levels.⁷ Adopted in December 1996 and readopted in August 2001, Framework Element provides general guidance regarding land use issues. The Framework Element focuses on providing strategies that encourage growth in a number of higher-intensity commercial and mixed-use districts, centers, and boulevards, as well as industrial districts, particularly in proximity to transportation corridors and transit stations. The Framework Element is intended to be flexible and recommends the creation of new land use categories for targeted growth areas in various areas of the City that will contain regional centers, community centers, neighborhood districts, and mixed-use boulevards based on the planning principles, goals, objectives, and policies it discusses. 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.

The Framework Element's central housing goal is an equitable distribution of housing opportunities by type and cost accessible to all residents of the City. The following Framework Element housing objective is relevant to the Project:

⁵ SCAG, *News Release: SCAG Regional Council Formally Adopts Connect SoCal, September 3, 2020.*

⁶ *For example, the Project would be consistent with both the 2016–2040 RTP/SCS and the 2020–2045 RTP/SCS because it would increase urban density within a High-Quality Transit Area (HQTA) immediately adjacent to a Metro light rail station and in close proximity 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 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.*

⁷ *City of Los Angeles Department of City Planning, Housing Element 2013–2021, City of Los Angeles General Plan, adopted December 3, 2013.*

- Objective 4.2: Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.

(b) Los Angeles General Plan Housing Element

The City of Los Angeles General Plan Housing Element 2013–2021 (Housing Element), adopted in December 2013, addresses the housing needs of the City’s residents based on a comprehensive overview of the City’s population, household types, housing stock characteristics, and other special needs. As part of this effort, the Housing Element focuses on the City’s assigned portion of SCAG’s 5th Cycle RHNA (discussed above). The Housing Element identifies four primary goals and associated objectives, policies and programs.⁸ The goals are: (1) a City where housing production and preservation result in an adequate supply of ownership and rental housing that is safe, healthy, sanitary, and affordable to people of all income levels, races, ages, and suitable for their various needs; (2) a City in which housing helps to create safe, livable and sustainable neighborhoods; (3) a City where there are housing opportunities for all without discrimination; and (4) a City committed to ending and preventing homelessness. The following Housing Element objectives are relevant to the Project:

- 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 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.

⁸ *City of Los Angeles Department of City Planning, Housing Element 2013–2021, City of Los Angeles General Plan, adopted December 3, 2013.*

- Objective 3.2: Promote fair housing practices and accessibility among residents, community stakeholders and those involved in the production, preservation and operation of housing.

The City's current Housing Element functions as a guiding document for the City's housing policy between 2013 and 2021 and remains in effect through 2021. The City will launch the 2021–2029 Housing Element Update process in Winter 2020 and currently anticipates final adoption of the updated Housing Element in Summer 2021.

(c) Central City Community Plan

The Project Site is located within the Central City Community Plan area.⁹ The Central City Community Plan (Community Plan), last adopted in January 2003, includes the following objectives and policies that are relevant to population and housing:

- Objective 1-2: To increase the range of housing choices available to Downtown employees and residents.
 - Policy 1-2.1: Promote the development of neighborhood work/live housing.
- Objective 1-3: To foster residential development which can accommodate a full range of incomes.
- Objective 2-1: To improve Central City's competitiveness as a location for offices, business, retail, and industry.
- Policy 2-2.1: Focus on attracting businesses and retail uses that build on existing strengths of the area in terms of both the labor force, and businesses.
- Policy 2-2.3: Support the growth of neighborhoods with small, local retail services.
- Objective 2-3: To promote land uses in Central City that will address the needs of all of the visitors to Downtown for businesses, conventions, trade shows, and tourism.

The Department of City Planning is currently updating the Central City Community Plan in conjunction with the Central City North Community Plan, whose areas together make up Downtown Los Angeles (sometimes known as Downtown Los Angeles [DTLA]), in

⁹ *City of Los Angeles, Zoning Information and Mapping System, Parcel Profile Report for 332 South Olive Street.*

a combined planning process referred to as the Draft Downtown Community Plan.¹⁰ The purpose of the Draft Downtown Community Plan is to develop and implement a future vision for Downtown Los Angeles that supports and sustains ongoing revitalization while thoughtfully accommodating projected future growth.¹¹ As Downtown has been a rapidly changing setting within Los Angeles, it supports a collection of economic opportunities and entrepreneurship, people, culture, and distinct neighborhoods, and sits at the center of the regional transportation network. According to the Draft Downtown Community Plan projections, an additional approximately 125,000 people, 70,000 housing units, and 55,000 jobs will be added to the Downtown area by the year 2040.¹² The Department of City Planning, in partnership with the Downtown community, is anticipated to reflect such growth trends in the updated plan and its policies, plans, and programs for Downtown. As such, the Draft Downtown Community Plan will inform developers of permitted development options, densities, and intensities and bring the 2003 Central City Community Plan up-to-date as an improved planning tool.¹³

b. Existing Conditions

(1) Population

(a) Regional Conditions

As shown in Table IV.H-1 on page IV.H-7, SCAG's 2016–2040 RTP/SCS growth forecast shows the population estimate for the SCAG Region in 2019 is approximately 19,260,875 people.¹⁴ By 2026 (the Project buildout year), the population in the SCAG

¹⁰ Because the Draft Downtown Community Plan has not yet been adopted, the information about this plan is provided in this section for informational purposes only.

¹¹ City of Los Angeles, *Draft Downtown Community Plan, About This Project*, <https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update>, accessed December 4, 2019.

¹² City of Los Angeles, *Draft Downtown Community Plan, About This Project*, <https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update>, accessed December 4, 2019.

¹³ City of Los Angeles, *Draft Downtown Community Plan, About This Project*, <https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update>, accessed December 4, 2019.

¹⁴ The 2019 extrapolated value is calculated using SCAG's 2012 and 2020 values to find the average increase between years and then applying that annual increase to 2012: $((19,395,000 - 18,322,000) \div 8) + 19,126,750 = 19,260,875$ (~19.26 million).

**Table IV.H-1
SCAG 2016–2040 RTP/SCS Forecast**

Year	Population (persons)	Housing (dwelling units)	Employment (jobs)
SCAG^a			
2019	19,260,875	6,348,750	8,373,625
2026	20,231,400	6,717,800	8,933,000
% change	5.04%	5.81%	6.68%
City of Los Angeles^b			
2019	4,036,475	1,416,700	1,814,575
2026	4,227,450	1,507,900	1,932,750
% change	4.73%	6.44%	6.51%
<p>^a Population, housing, and employment forecast for SCAG region in 2019 calculated based on linear interpolation of 2012 and 2020 values and 2026 calculated based on linear interpolation of 2020 and 2035 values.</p> <p>^b Population, housing, and employment forecast for City of Los Angeles in 2019 and 2026 based on linear interpolations of 2012 and 2040 values.</p> <p>Source: SCAG 2016–2040 RTP/SCS; Eyestone Environmental, 2020.</p>			

Region has been forecasted to increase to approximately 20,234,400 million people, an increase of 5.04 percent.¹⁵

(b) City of Los Angeles

As provided in Table IV.H-1, SCAG's 2016–2040 RTP/SCS growth forecast projects a population for the City of Los Angeles of approximately 4,036,475 in 2019.¹⁶ SCAG's forecast projects a population of 4,227,450 million¹⁷ people by 2026, an increase of 4.73 percent from 2019.

¹⁵ The 2026 extrapolated value is calculated using SCAG's 2020 and 2035 values to find the average increase between years and then applying that annual increase to 2026: $((21,486,000 - 19,395,000) \div 15) * 15 + 20,092,000 = 20,231,400$ (~20.23 million).

¹⁶ The 2019 extrapolated value is calculated using SCAG's 2012 and 2040 values to find the average increase between years and then applying that annual increase to 2012: $((4,609,400 - 3,845,500) \div 28) * 7 + 3,845,500 = 4,036,475$ (~4.03 million).

¹⁷ The 2026 extrapolated value is calculated using SCAG's 2012 and 2040 values to find the average increase between years and then applying that annual increase to 2020: $((4,609,400 - 3,845,500) \div 28) * 14 + 3,845,500 = 4,227,450$. (~4.22 million).

As indicated previously, the Draft Downtown Community Plan forecasts that an additional approximately 125,000 people (e.g., residents) will be added to the Downtown area by the year 2040.¹⁸

(c) Project Site

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently mostly landscaped and vacant except for the Los Angeles County Metropolitan Transportation Authority (Metro) B (formerly Red) and D (formerly Purple) Lines Pershing Square Station portal, located on the southeast corner of the Project Site. The Project Site contains no existing housing or associated residential population.

(2) Housing

Recent data indicate that growth in housing demand has slowed due in part to the rapid increases in housing cost over the past few years.¹⁹ Nevertheless, California, and especially the coastal metropolitan areas like Los Angeles, still lacks an adequate supply of housing.²⁰ Propelled by continuing population and employment growth coupled with uneven and insufficient construction, the housing shortfall has left California with one of the tightest and most expensive housing markets in the nation despite the overall decline in median prices resulting from the recent recession.

(a) Regional Conditions

As summarized above in Table IV.H-1 on page IV.H-7, SCAG's 2016–2040 RTP/SCS regional growth forecast projects approximately 6,348,750 households in the SCAG Region in 2019.²¹ By 2026, the number of households is expected to increase by 5.81 percent to approximately 6,717,800 million households.²²

¹⁸ *City of Los Angeles, Draft Downtown Community Plan, About This Project, <https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update>, accessed December 4, 2019.*

¹⁹ *UCLA Anderson School, The UCLA Anderson Forecast for the Nation and California, 2015 1st Quarter, March 2015.*

²⁰ *State of California, Department of Housing and Community Development, Division of Housing Policy Development, The State of Housing in California 2012: Supply and Affordability Problems Remain (Updated August 2012).*

²¹ *The 2019 extrapolated value is calculated using SCAG's 2012 and 2020 values for the SCAG region to find the average increase between years and then applying that annual increase to 2012: $((6,415,000 - 5,885,000) \div 8) + 6,282,500 = 6,348,750$ (~6.35 million).*

²² *The 2026 extrapolated value is calculated using SCAG's 2020 and 2035 values for the SCAG region to find the average increase between years and then applying that annual increase to 2020: $((7,172,000 - 6,415,000) \div 15) + 6,667,333 = 6,717,800$ (~6.72 million).*

(b) City of Los Angeles

Based on SCAG's 2016–2040 RTP/SCS growth forecast, as provided in Table IV.H-1 on page IV.H-7, approximately 1,416,700 households were projected in the City of Los Angeles in 2019.²³ By 2026, the City is expected to add another 91,200 households (an increase of 6.44 percent) for a total of 1,507,900 households.²⁴

Also, as indicated previously, the Draft Downtown Community Plan forecasts that an additional approximately 70,000 housing units will be added to the Downtown area by the year 2040.²⁵

(c) Project Site

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently mostly landscaped and vacant except for the Metro B and D Lines Pershing Square Station portal, located on the southeast corner of the Project Site. The Project Site contains no existing housing.

(3) Employment*(a) Regional Conditions*

As summarized above in Table IV.H-1, based on SCAG's 2016-2040 RTP/SCS regional growth forecasts, approximately 8,373,625 jobs were projected for the SCAG Region in 2019.²⁶ By 2026, the number of jobs is expected to increase by 6.68 percent to approximately 8,933,00 jobs.²⁷

²³ The 2018 extrapolated value is calculated using SCAG's 2012 and 2040 values for the City of Los Angeles to find the average increase between years and then applying that annual increase to 2012: $((1,690,300 - 1,325,500) \div 28) * 7 + 1,325,500 = 1,416,700$ (~1.42 million).

²⁴ The 2026 extrapolated value is calculated using SCAG's 2012 and 2040 values for the City of Los Angeles to find the average increase between years and then applying that annual increase to 2012: $((1,690,300 - 1,325,500) \div 28) * 14 + 1,325,500 = 1,507,900$ (~1.51 million).

²⁵ City of Los Angeles, *Draft Downtown Community Plan, About This Project*, <https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update>, accessed December 4, 2019.

²⁶ The 2019 interpolated value is calculated using SCAG's 2012 and 2020 values for the SCAG region to find the average employment increase between years and then applying that annual increase to 2012: $[(8,507,000 - 7,440,000) \div 8] + 8,240,250 = 8,373,625$ (~8.24 million).

²⁷ The 2026 interpolated value is calculated using SCAG's 2020 and 2035 values for the SCAG region to find the average employment increase between years and then applying that annual increase to 2020: $[(9,572,000 - 8,507,000) \div 15] + 8,862,000 = 8,933,000$ (~9 million).

(b) City of Los Angeles

Based on SCAG's 2016-2040 RTP/SCS growth forecast, as provided in Table IV.I 1, approximately 1,814,575 jobs were projected for the City of Los Angeles in 2019.²⁸ By 2026, the number of jobs is expected to increase by 6.51 percent to approximately 1,932,750 jobs.²⁹

As indicated previously, the Draft Downtown Community Plan forecasts that an additional approximately 55,000 jobs will be added to the Downtown area by the year 2040.³⁰

(c) Project Site

As discussed above, the Project Site is currently mostly landscaped and vacant except for the Metro B and D Lines Pershing Square Station portal, located on the southeast corner of the Project Site. Therefore, the Project does not accommodate any existing employees.

3. Project Impacts

a. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, the Project would have a significant impact related to population or 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)?

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

²⁸ The 2019 interpolated value is calculated using SCAG's 2012 and 2040 values for the City of Los Angeles to find the average employment increase between years and then applying that annual increase to 2012: $[(2,169,100 - 1,696,400) \div 28] \times 7 + 1,696,400 = 1,814,575$ (~1.8 million).

²⁹ The 2026 interpolated value is calculated using SCAG's 2012 and 2040 values for the City of Los Angeles to find the average employment increase between years and then applying that annual increase to 2012: $[(2,169,100 - 1,696,400) \div 28] \times 14 + 1,696,400 = 1,932,750$ (~2 million).

³⁰ City of Los Angeles, Draft Downtown Community Plan, About This Project, <https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update>, accessed December 4, 2019.

For this analysis, the Appendix G Thresholds listed above are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions.

The L.A. CEQA Thresholds Guide identifies the following factors to evaluate population and housing growth on a case-by-case basis:

- 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;
- 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.

b. Methodology

The environmental impacts of the Project with respect to population, housing and employment growth are determined based on the proposed number of residential units included in the Project, all of which are conservatively estimated to be occupied (i.e., "households").

The population impacts of the Project are determined based on the estimated number of people who would occupy the proposed number of residential units included in the Project, as well as the indirect population associated with the Project. The Project's population impacts are then compared to population projections from SCAG's 2016–2040 RTP/SCS. Growth forecasts for the SCAG Region and the City of Los Angeles were derived based on straight-line interpolations of data from SCAG and the Department of City Planning for the Project's baseline year (2019) and the Project's buildout year (2026).

The Project's housing demand is similarly compared to SCAG's household projections for the SCAG Region and the City of Los Angeles. The Project's impacts are also evaluated against other applicable City and regional housing/household goals, objectives, and policies.

With respect to employment, the focus of environmental analysis prepared under CEQA is a project's potential to cause effects on the *physical* environment.³¹ Accordingly, the 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.³² The CEQA Guidelines are very clear in that there must be a physical change resulting from the project directly or indirectly for an impact to be considered significant.³³

However, social and economic effects, including employment, are relevant CEQA issues to the extent that anticipated social and economic changes arising from a proposed project may result in physical changes.³⁴ Additionally, if a project's physical impacts would cause social or economic effects, the magnitude of the social or economic effects may be relevant in determining whether a physical impact is "significant."³⁵ If the physical change causes adverse economic or social effects on people, those adverse effects may be used as the basis for determining that the physical change is significant.³⁶

The Project's direct employment impacts are compared to SCAG's employment growth projections for the SCAG region and the City, as interpolated to 2026 (the Project buildout year).

As set forth above, the analysis of potential population, housing, and employment impacts is based largely on information obtained from SCAG's growth forecasts in the 2016–2040 RTP/SCS, but also on the growth forecasts for Downtown in the Draft Downtown Community Plan.

³¹ "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 (Public Resources Code Section 21060.5).

³² CEQA Guidelines Sections 15131(a) and 15064(f); see also Pub. Resources Code §§ 21100 and 21151. "Significant effect on the environment" means a substantial, or potentially substantial adverse change in the environment (Public Resources Code Section 21068).

³³ See discussion following CEQA Guidelines Section 15131.

³⁴ CEQA Guidelines Sections 15131(a) and 15064(f).

³⁵ CEQA Guidelines Section 15131(b). 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."

³⁶ CEQA Guidelines Section 15064(f).

c. Project Design Features

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

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)?

(1) Impact Analysis

(a) Construction

Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely, to any notable degree, relocate their households as a consequence of the construction job opportunities presented by the Project. The construction industry differs from most other industry sectors in several important ways that are relevant to potential impacts on population and housing:

- There is no regular place of work. Construction workers commute to job sites that change many times in the course of a year. These often lengthy daily commutes are made possible by the off-peak starting and ending times of the typical construction work day.
- Many construction workers are highly specialized (e.g., crane operators, steel workers, masons), and move from job site to job site as dictated by the demand for their skills.
- The work requirements of most construction projects are also highly specialized and workers are employed on a job site only as long as their skills are needed to complete a particular phase of the construction process.

Based on these factors, it is reasonable to assume that Project-related construction workers would not relocate their households' places of residence as a direct consequence of working on the Project. **Therefore, the Project's construction activities would not induce substantial unplanned 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.**

With regard to employment, Project development would generate construction workers on-site during the demolition, grading and excavation, and building construction and finishing phases. However, individual construction projects generally do not generate new permanent employment within the region. Rather, there is a pool of construction workers who move from project to project as work is available. The Project would, therefore, support the regional pool of construction workers and also support indirect jobs in a wide range of industries throughout the region resulting from purchases of construction-related supplies, goods and services, and household expenditures by direct and indirect employees. **Overall, since construction employment related to the Project would be temporary and would not exceed expected growth, construction-related employment impacts would be less than significant.**

(b) Operation

(i) Direct Population Impacts

As discussed in Section II, Project Description, of this Draft EIR, the Project would include the development of: 180 residential for-sale condominiums; 252 residential apartments; two hotels with a combined total of 515 guest rooms and 12,170 square feet of hotel restaurant use; and 72,091 square feet of General Commercial (e.g., retail and restaurant) uses. Based on a household size factor of 2.41 persons per household, the Project's 432 residential dwelling units could generate a residential population of approximately 1,042 persons at full build-out.³⁷

As illustrated in Table IV.H-2 on page IV.H-15, based on SCAG's 2016–2040 RTP/SCS, the estimated population of 1,042 persons generated by the Project's proposed 432 residential dwelling units would represent approximately 0.11 percent of the projected growth in the SCAG region between 2019 and 2026 (i.e., the Project's baseline and buildout years), and 0.55 percent of the projected growth in the City during the same period. Furthermore, the 1,042 persons generated by the Project would represent approximately 0.83 percent of the population growth (e.g., 125,000 persons) projected in Downtown by the Draft Downtown Community Plan through 2040. As such, the 1,042 new residents generated by the Project would be well within SCAG and City growth forecasts, constituting an extremely small percentage of projected City and regional growth. **Therefore, the Project would not directly induce substantial unplanned population growth in the area during operation, and impacts related to population growth would be less than significant.**

³⁷ *Based on a rate of 2.41 persons per multi-family unit based on 2018 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.*

**Table IV.H-2
Project Percentage Share of 2018–2026 Growth**

Year	Project Impact	Percent of SCAG Growth	Percent of Los Angeles Growth
Population	1,042 persons ^a	0.11%	0.55%
Housing	432 units	0.12%	0.47%
Employment	535 jobs ^b	0.06%	0.45%

^a Based on a rate of 2.41 persons per multi-family unit based on 2018 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.

^b Based on employee generation rates from the Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation Version 1.3, May 2020, Table 1, including: General Retail = 2/1,000 sf; Restaurant (high-turnover sit-down and quality restaurants) = 4/1,000 sf; and Hotel = 0.5/rm. Equation: $(30,466 \text{ sf retail}/2 \text{ employees per } 1,000 \text{ sf}) + (53,795 \text{ sf restaurant}/4 \text{ employees per } 1,000 \text{ sf}) + (258 \text{ hotel rms}/0.5 \text{ per rm}) = 535 \text{ employees}$. This 535-employee estimate is consistent with the VMT Calculator estimate in the Transportation Assessment included as Appendix J.1 of this Draft EIR.

Source: SCAG 2016–2040 RTP/SCS; Eyestone Environmental, 2020.

(ii) Direct Housing Impacts

As stated in many adopted regional and local planning documents, including the City’s 2013–2021 Housing Element, the City remains in need of new dwelling units to serve both current and projected populations. While the Project would not eliminate the housing shortage in the City, it would incrementally advance the goal of generating more housing for the region in a developed, transit-oriented, infill location. As shown in Table IV.H-2, the 432 residential dwelling units would represent approximately 0.12 percent of the projected housing growth in the SCAG region between 2019 and 2026, and 0.47 percent of the projected housing growth in the City of Los Angeles during the same period. Furthermore, the 432 residential dwelling units generated by the Project would represent approximately 0.617 percent of the growth in the number of residential dwelling units (e.g., 70,000 units) projected in Downtown by the Draft Downtown Community Plan through 2040. These new units would help the City meet its fair share of the regional housing demand identified by SCAG in the 5th Cycle RHNA (82,002 units for the years 2013 to 2021 or an average of approximately 10,250 units per year). This would include helping the City meet its fair share of affordable housing demand as 5 percent of the proposed 252 apartment units would be affordable units. As such, the Project would not directly generate substantial housing growth that would exceed SCAG and City growth projections for the Project’s buildout year. **Therefore, the Project would not directly induce substantial unplanned housing growth in the area during operation, and impacts related to housing growth would be less than significant.**

(iii) Employment

As shown in Table IV.H-2 on page IV.H-15, development of the proposed hotel and commercial uses would result in an estimated 535 permanent full-time and part-time employment positions on the Project Site. As shown on Table IV.H-2, these additional 535 employees would represent approximately 0.06 percent of the employment growth forecasted for the SCAG region and approximately 0.45 percent of the employment growth forecasted for the City between 2019 and 2026. Therefore, the employment opportunities generated by the Project would be within the SCAG's employment forecast for the region and the City. **Thus, the Project would not directly induce substantial unplanned employment growth in the area during operation, and impacts related to employment growth would be less than significant.**

(iii) Indirect Population, Housing and Employment Impacts

As discussed above, in addition to 432 new residential dwelling units, the Project would include: two hotels with a combined total of 515 guest rooms and 12,170 square feet of hotel restaurant use, and 72,091 square feet of General Commercial (e.g., retail/restaurant) uses. As indicated in Table IV.H-2, these proposed non-residential uses would generate an estimated 535 permanent full-time and part-time jobs. However, given the Project's Downtown location and the types of jobs to be created (e.g., primarily service jobs), it is anticipated that the majority of these jobs would be filled by persons already residing in the vicinity who would not relocate their households for such employment opportunities, and by persons who would commute to the Project Site from other communities in and outside of the City. As such, the Project would not indirectly induce substantial population growth that would exceed SCAG and City projections for the Project's buildout year.

In the event that some of the Project's employment opportunities are filled by persons from outside of the area who relocate for their job, any indirect demand for housing would be fulfilled by a combination of the Project's new dwelling units, vacancies in the surrounding housing market, and from other new units in the vicinity of the Project Site, such as those associated with the related projects listed in Table IV.H-2. As such, the Project's indirect housing demand would not be substantial or cause housing growth to exceed SCAG's forecasts for the Project's buildout year.

As illustrated in Table IV.H-2, based on employee generation rates provided by LADOT and DCP, the proposed hotel and commercial uses would result in an approximately 535 employees.³⁸ As shown on Table IV.H-2, the additional 535 employees

³⁸ *Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation Version 1.3, May 2020, Table 1. Based on 0.5 employees/* (Footnote continued on next page)

generated by the Project would represent approximately 0.06 percent of the employment growth forecasted for the SCAG region and approximately 0.45 percent of the employment growth forecasted for the City between 2019 and 2026. Furthermore, the 535 employees generated by the Project would represent approximately 0.97 percent of the growth in the number of jobs (e.g., 55,000 jobs) projected in Downtown by the Draft Downtown Community Plan through 2040. Therefore, the employment opportunities generated by the Project would be within the SCAG and City employment forecast for the region and the City. **Thus, the Project would not induce substantial unplanned population growth in the area during operation, and impacts related to employment growth would be less than significant.**

With regard to infrastructure, the Project would not induce substantial population growth by introducing unplanned infrastructure or accelerating development in an undeveloped area. Although the Project Site is vacant and undeveloped in the existing condition, it is surrounded by existing urban infrastructure and development typical of the urban core. The Project would improve internal circulation on the Project Site with a series of pedestrian linkages that accommodate pedestrian circulation and connectivity between the Bunker Hill and Historic Core areas of downtown. The Project also improve vehicular access to the Project Site through the provision of driveways into the site and would facilitates improved use of transit because the Metro B and D Lines Pershing Square Station portal is located on a portion of the Project Site. These improvements and others planned for the Project would improve circulation flows and safety throughout the Project Site and vicinity. Utility and other infrastructure improvements planned for the Project are intended to connect the proposed uses to the existing main infrastructure system and would not require upgrades or expansions to the main water or wastewater system as discussed in Sections IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, and Section IV.L.2, Utilities and Service Systems—Wastewater, of this Draft EIR. In sum, while the Project would improve access to and provide infrastructure within the Project Site, it would not extend roads or other infrastructure to an area not already served by roads and infrastructure. **Therefore, the Project would not indirectly induce substantial unplanned population growth in the area and operational impacts related to infrastructure improvements would be less than significant.**

(2) Mitigation Measures

Project-level impacts related to inducing substantial unplanned population growth in the area would be less than significant. Therefore, no mitigation measures are required.

*rooms for Hotel (including restaurant, facilities, etc.); 2.0 employees/ksf for general retail uses; 4.0 employees/ksf for High-Turnover Sit-Down Restaurant: $(515 * 0.5) + (12.17 * 4.0) + (30.466 * 2.0) + (41.625 * 4.0) = \sim 2,882$ employees.*

(3) Level of Significance After Mitigation

Project-level impacts related to inducing substantial unplanned population growth in the area measures were required or included, and the impact level remains less than significant.

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

As discussed in Section IV, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study prepared for this Project, included in Appendix A.1 of this Draft EIR, the Project Site is mostly landscaped and vacant except for the Metro B and D Lines Pershing Square Station portal located at the southeast corner of the Project Site. No housing currently exists on the Project Site. As such, the Project would not displace any existing people or housing, nor would it require the construction of housing elsewhere. **Therefore, impacts with respect to Threshold (b) would not occur. No further analysis is required.**

e. Cumulative Impacts

The analysis below addresses the cumulative impacts of the Project on 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.³⁹ The cumulative impact analysis evaluates growth projections of the 2016–2040 RTP/SCS and the Draft Downtown Community Plan to determine the Project's contributing effect on potential cumulative impacts.

(1) Impact Analysis

As identified in Section III, Environmental Setting, of this Draft EIR, 50 related projects in the surrounding area are assumed to be constructed and/or operational during the same time period as the Project (e.g., between the preparation of this Draft EIR and Project buildout in 2026). Much of this growth is anticipated by the City and will be incorporated into the Central City Community Plan update, known as the Draft Downtown Community Plan, which the Department of City Planning is in the process of preparing. As indicated previously, the Draft Downtown Community Plan forecasts that approximately

³⁹ CEQA Guidelines Section 15065(a)(3).

125,000 people, 70,000 housing units, and 55,000 jobs will be added to the Downtown area by the year 2040.⁴⁰

Table IV.H-3 on page IV.H-20 shows estimates for population, housing, and employment generated by each of the related projects. Further discussion of these estimates is provided below in Table IV.H-4 on page IV.H-26 to contextualize the impact of the related projects within the City of Los Angeles Subregion of SCAG.

The Project would include an estimated population of 1,042 persons (residents), which when combined with the estimated 45,811 persons (residents) associated with the related projects would result in a total of 46,853 persons (residents). As shown in Table IV.H-4, based on the forecasts in the 2016–2040 RTP/SCS, the combined population of the Project and the related projects would represent approximately 4.83 percent and 24.53 percent of the population growth projected during the 2019-2026 period within the SCAG region and the City, respectively. Hence, the population associated with the Project and the related projects would be within applicable SCAG growth projections.

The Project would include 432 residential units, which when combined with the 18,592 residential units of the related projects would result in a total of 19,024 residential units. As shown in Table IV.H-4, based on the forecasts in the 2016–2040 RTP/SCS, the combined residential units of the Project and the related projects would represent approximately 5.15 percent and 20.85 percent of the residential unit growth projected during the 2019-2026 period within the SCAG region and the City, respectively. Hence, the residential units associated with the Project and the related projects would be within applicable SCAG growth projections.

The Project would include an estimated 535 employees, which when combined with the estimated 15,117 employees associated with the related projects would result in a total of 15,652 employees. As shown in Table IV.H-4, based on the forecasts in the 2016–2040 RTP/SCS, the combined employees of the Project and the related projects would represent approximately 2.80 percent and 13.24 percent of the employee growth projected during the 2019-2026 period within the SCAG region and the City, respectively. Hence, the employees associated with the Project and the related projects would be within applicable SCAG growth projections.

⁴⁰ *City of Los Angeles, Draft Downtown Community Plan, About This Project, <https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update>, accessed December 4, 2019. Growth projections current as of December 2018.*

**Table IV.H-3
Population and Housing Estimates**

No.	Project Name	Address	Description	Size	Population (persons) ^a	Housing (units)	Employees ^{b,c}
1	Equity Residential Mixed-Use	340 S. Hill St.	Apartments	406 du	978	406	—
			Affordable Apartments	22 du	53	22	—
			Office	2,980 sf	—	—	12
			Retail	2,630 sf	—	—	5
2	5th & Olive (formerly Park Fifth Project)	437 S. Hill St.	Condominiums	660 du	1,590	660	—
			Restaurant	13,742 sf	—	—	55
3	Mixed-Use	400 S. Broadway	Apartments	450 du	1,085	450	—
			Retail	6,904 sf	—	—	14
			Bar	5,000 sf	—	—	20
4	4th & Spring Hotel	361 S. Spring St.	Hotel	315 rm	—	—	158
			Meeting Space	2,000 sf	—	—	4
5	5th & Hill	323 W. 5th St.	Hotel	190 rm	—	—	95
			Meeting Room	6,100 sf	—	—	12
			Apartments	31 du	75	31	—
			Restaurant	29,200 sf	—	—	117
6	Grand Avenue Project	100 S. Grand Ave.	Apartments	412 du	993	412	—
			Condominiums	1,648 du	3,972	1,648	—
			Retail	225,300 sf	—	—	451
			Supermarket	53,000 sf	—	—	212
			Restaurant	67,000 sf	—	—	268
			Health Club	50,000 sf	—	—	50
			Event Facility	250 seats	—	—	5
			Hotel	275 rm	—	—	138
Office	681,000 sf	—	—	2,724			
7	Hellman/Banco Building	354 S. Spring St.	Apartments	212 du	511	212	—

Table IV.H-3 (Continued)
Population and Housing Estimates

No.	Project Name	Address	Description	Size	Population (persons) ^a	Housing (units)	Employees ^{b,c}
8	Tribune (LA Times) South Tower Project	222 E. 2nd St.	Condominiums	107 du	258	107	—
			Office	534,044 sf	—	—	2,136
			Retail	7,200 sf	—	—	14
9	433 South Main Street	433 S. Main St.	Condominiums	196 du	472	196	—
			Retail	5,300 sf	—	—	11
			Restaurant	900 sf	—	—	4
10	Medallion Phase 2	300 S. Main St.	Apartments	471 du	1,135	471	—
			Restaurant	27,780 sf	—	—	111
			Retail	5,190 sf	—	—	10
11	Mixed-Use (Times Mirror Square)	100 S. Broadway	Apartments	1,127 du	2,716	1,127	—
			Office	285,088 sf	--	--	1,140
			Supermarket	50,000 sf	--	--	200
			Restaurant	75,589 sf	--	--	302
12	Budokan of Los Angeles	237 S. Los Angeles St.	Sports Complex	43,453 sf	--	--	87
13	Mixed-Use	601 S. Main St.	Apartments	452 du	1,089	452	—
			Retail	25,000 sf	—	—	50
14	Spring Street Hotel	633 S. Spring St.	Hotel	176 rm	—	—	88
			Bar	5,290 sf	—	—	21
			Restaurant	8,430 sf	—	—	34
15	Broadway Mixed-Use	955 S. Broadway	Apartments	163 du	393	163	—
			Retail	6,406 sf	—	—	13
16	Wilshire Grand Project	900 W. Wilshire Blvd	Hotel	560 rm	—	—	280
			Apartments	100 du	241	100	—
			Office	150,000 sf	—	—	600
			Retail/Restaurant	275,000 sf	—	—	550

Table IV.H-3 (Continued)
Population and Housing Estimates

No.	Project Name	Address	Description	Size	Population (persons) ^a	Housing (units)	Employees ^{b,c}
17	LA Civic Center Office	150 N. Los Angeles St.	Office	712,500 sf	—	—	2,850
			Retail	35,000 sf	—	—	70
			Child Care	2,500 sf	—	—	5
18	Mixed-Use	737 S. Spring St.	Apartments	320 du	1,865	320	—
			Pharmacy/Drugstore	25,000 sf	—	—	50
19	Mixed-Use	732 S. Spring St.	Apartments	400 du	964	400	—
			Retail	15,000 sf	—	—	30
20	8th/Grand/Hope Project	754 S. Hope St.	Condominiums	409 du	986	409	—
			Retail	7,329 sf	—	—	15
21	Beaudry Ave & 2nd St. Mixed-Use Project.	130 S. Beaudry Ave	Apartments	220 du	530	220	—
			Other	9,000 sf	—	—	18
22	Mixed-Use	820 S. Olive St.	Apartments	589 du	1,419	589	—
			Retail	4,500 sf	—	—	9
23	Mixed-Use	840 S. Olive St.	Condominiums	303 du	730	303	—
			Restaurant	9,680 sf	—	—	39
24	7th & Maple Mixed-Use	701 S. Maple Ave.	Apartments	452 du	1,089	452	—
			Retail	6,800 sf	—	—	14
			Restaurant	6,800 sf	—	—	27
25	Mitsui Fudosan (Eighth and Figueroa Tower)	744 S. Figueroa St.	Apartments	436 du	1,051	436	—
			Restaurant	3,750 sf	—	—	15
			Retail	3,750 sf	—	—	8
26	945 West 8th Street	945 W. 8th St.	Apartments	781 du	1,882	781	—
			Commercial	6,700 sf	—	—	13
27	Mixed-Use	755 S. Los Angeles St.	Office	60,243 sf	—	—	241
			Retail	16,694 sf	—	—	33
			Restaurant	26,959 sf	—	—	108

Table IV.H-3 (Continued)
Population and Housing Estimates

No.	Project Name	Address	Description	Size	Population (persons) ^a	Housing (units)	Employees ^{b,c}
28	Alexan South Broadway	850 S. Hill St.	Apartments	305 du	735	305	—
			Retail	3,500 sf	—	—	7
			Restaurant	3,500 sf	—	—	7
29	845 Olive & 842 Grand Mixed-Use	845 S. Olive St.	Apartments	208 du	501	208	—
			Retail	2,430 sf	—	—	5
30	Embassy Tower	848 S. Grand Ave.	Condominiums	420 du	1,012	420	—
			Retail	38,500 sf	—	—	77
31	Southern California Flower Market Project	755 S. Wall St.	Apartments	323 du	778	323	—
			Office	53,200 sf	—	—	213
			Commercial	8,820 sf	—	—	18
32	Tenten Wilshire Expansion (the Icon)	1027 W. Wilshire Blvd.	Condominiums	402 du	967	402	—
			Retail	4,728 sf	—	—	9
33	Weingart Tower—Affordable Housing	554 S. San Pedro St.	Affordable Apartments	378 du	911	378	—
			Market-Rate Apartments	4 du	10	4	—
			Retail	1,758 sf	—	—	4
			Office	4,410 sf	—	—	18
			Flex	5,932 sf	—	—	12
34	1018 West Ingraham Street	1018 W. Ingraham St.	Apartments	43 du	104	43	—
			Retail	7,400 sf	—	—	15
35	Mixed-Use	609 E. 5th St.	Apartments	151 du	364	151	—
36	Sapphire Mixed-Use (Revised)	1111 W. 6th St.	Apartments	362 du	872	362	—
			Retail	25,805 sf	—	—	52
37	600 South San Pedro Street	600 S. San Pedro St.	Apartments	303 du	730	303	—
			Commercial	19,909 sf	—	—	40
38	Hill Street Mixed-Use	920 S. Hill St.	Apartments	239 du	576	239	—
			Retail	5,400 sf	—	—	11

Table IV.H-3 (Continued)
Population and Housing Estimates

No.	Project Name	Address	Description	Size	Population (persons) ^a	Housing (units)	Employees ^{b,c}
39	Ferrante	1000 W. Temple St.	Apartments	1,500 du	3,615	1,500	—
			Retail	30,000 sf	—	—	60
40	655 South San Pedro Street Residential	655 S. San Pedro St.	Apartments	81 du	195	81	—
41	Broadway Palace	928 S. Broadway	Apartments	667 du	1,607	667	—
			Condominiums	17 du	41	17	—
			Retail	58,800 sf	—	—	118
42	La Plaza Cultura Village	527 N. Spring St.	Apartments	345 du	831	345	—
			Retail	23,000 sf	—	—	46
			Specialty Retail	21,000 sf	—	—	42
			Restaurant	11,000 sf	—	—	44
43	Mixed-Use	1322 W. Maryland St.	Apartments	47 du	113	47	—
			Retail	760 sf	—	—	2
44	Mixed-Use	700 W. Cesar Chavez Ave.	Apartments	300 du	723	300	—
			Retail	8,000 sf	—	—	16
45	Hotel & Apartments	675 S. Bixel St.	Apartments	422 du	1,017	422	—
			Hotel	126 rm	—	—	63
			Retail	4,874 sf	—	—	10
46	949 South Hope Street Mixed-Use Development	949 S. Hope St.	Apartments	236 du	569	236	—
			Retail	5,954 sf	—	—	12
47	940 South Hill Mixed-Use	940 S. Hill St.	Apartments	232 du	559	232	—
			Retail	14,000 sf	—	—	28
48	Residential	350 S. Figueroa St.	Apartments	570 du	1,374	570	—
49	333 South Figueroa Street	333 S. Figueroa St.	Apartments	224 du	540	224	—
			Condominiums	242 du	583	242	—
			Hotel	599 rm	—	—	300
			Commercial	28,705 sf	—	—	54

Table IV.H-3 (Continued)
Population and Housing Estimates

No.	Project Name	Address	Description	Size	Population (persons) ^a	Housing (units)	Employees ^{b,c}
50 ^d	Figueroa Centre	911 S. Figueroa St.	Hotel	220 rm	—	—	110
			Apartments	200 du	482	200	—
			Commercial	94,080 sf	—	—	188
Related Projects Total					45,811	18,592	15,117
Project Total					1,042	432	535
Related Projects + Project					46,853	19,024	15,652

du = dwelling units

emp = employees

rm = rooms

sf = square feet

^a Based on a rate of 2.41 persons per multi-family unit from the 2018 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.

^b Based on employee generation rates from the Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation Version 1.3, May 2020, Table 1, including: General Retail = 2/1,000 sf; Restaurant (high-turnover sit-down and quality restaurants) = 4/1,000 sf; Hotel = 0.5/rm; General Office = 4/1,000 sf; Pharmacy = 2/1,000 sf; Supermarket = 4/1,000 sf; and Health Club = 1/1,000 sf.

^c The VMT Calculator does not have employee generation rates for Flex, Other, Meeting Space/Room, Child Care, Event Facility, Sports Complex uses, Therefore, the VMT Calculator's employee generation rate for Retail (e.g., 2/1,000 sf) was used for these uses, except for Event Facility where the VMT Calculator's rate for movie theaters (e.g., 0.02/seat) was used.

^d Related Project No. 50 has been terminated. However, it has been retained in this related projects list because this list has been previously approved by both City Planning and LADOT (see the LADOT TIA Assessment Letter included as Appendix J.1 of this Draft EIR), and because retaining this related project provides a conservative analysis of cumulative impacts in this Draft EIR.

Source: Gibson Transportation Consulting, 2020, Eyestone Environmental 2020.

**Table IV.H-4
Cumulative Population and Housing Impacts—2016–2040 RTP/SCS**

	Population (people)	Housing (units)	Employment (Jobs)
Proposed Project Impact	1,042	432	535
Existing to be Removed	—	—	0
Total Net Project Impact (Proposed – Existing)	1,042	432	535
Related Projects Impact for City of Los Angeles	45,811	18,592	15,117
Cumulative (Project + Related Projects) Impact for the City of Los Angeles	46,853	19,024	15,652
SCAG Region 2026 Forecast	20,231,400	6,717,800	8,933,000
SCAG Region Growth, 2018–2026	970,525	369,050	559,375
City of Los Angeles 2026 Forecast	4,227,450	1,507,900	1,932,750
City of Los Angeles Growth, 2018–2026	190,975	91,200	118,175
Cumulative (Project + Related Projects) Share of Impact in the SCAG Region, 2026	4.83%	5.15%	2.80%
Cumulative (Project + Related Projects) Share of Impact in the City of Los Angeles, 2026	24.53%	20.85%	13.24%
<i>Source: SCAG 2016–2040 RTP/SCS; Eyestone Environmental, 2020.</i>			

As previously discussed, much of the growth described above is anticipated by the City and will be incorporated into the Draft Downtown Community Plan currently being prepared by the Department of City Planning. Currently, the Draft Downtown Community Plan projections indicate an additional approximately 125,000 people, 70,000 housing units, and 55,000 jobs will be added to the Downtown area by the year 2040. The growth associated with the Project together with the related projects, which would include an estimated 46,853 persons, 19,024 housing units, and 15,652 employees, would represent an estimated 37.48 percent, 27.18 percent, and 28.46 percent of the growth in population, housing units, and employees, respectively projected in Downtown by the Draft Downtown Community Plan. Hence, the population, housing units and employees associated with the Project and the related projects would be within the Downtown Community Plan growth projections. In any event, as the Draft Downtown Community Plan continues to evolve based on review of current development trends in the Downtown area and in consultation with relevant City departments, it will no doubt be updated to accurately reflect anticipated growth. Additionally, the development strategies and permitted development options, densities, and intensities within the plan are expected to reflect these growth trends.

Based on the above, the Project's incremental contribution to population, housing, and employment impacts would not be cumulatively considerable under CEQA, and cumulative impacts would be less than significant.⁴¹

(2) Mitigation Measures

Cumulative impacts related to inducing substantial unplanned population growth in the area would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts related to inducing substantial unplanned population growth in the area 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.

⁴¹ *State CEQA Guidelines, Section 15064(h)(1).*