IV. Environmental Impact Analysis

G. Population and Housing

1. Introduction

This section of the Draft EIR focuses on whether the Project would displace housing or residents necessitating replacement housing elsewhere. The potential for the Project to cause growth that exceeds projected or planned growth directly or indirectly was evaluated in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR. As such, no further evaluation of the Project's potential impacts associated with consistency with projected or planned growth is provided herein.

2. Environmental Setting

a. Regulatory Framework

(1) 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), the Southern California Association of Governments (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 SCAG Regional Housing Needs Assessment (RHNA) and the City's General Plan Housing Element are discussed further below.

(b) The Sustainable Communities and Climate Protection Act of 2008 (SB 75, Steinberg)

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 passenger vehicles and light-duty trucks guide the regional Metropolitan Planning Organization (MPOs) in the preparation of growth forecasts for population, households and employment. Under SB 375, the GHG-reduction target must be incorporated within that region's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). As discussed further below, SCAG's RTP/SCS provides a vision for transportation throughout the region for the next 25 years that achieves the statewide GHG-reduction targets; and in so doing identifies the amount and location of growth expected to occur within the region.

(2) Regional

(a) Southern California Association of Governments (SCAG)

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 for regional air quality plans developed by the South Coast Air Quality Management District (SCAQMD). SCAG prepares several plans to address regional growth, including the RHNA and the RTP/SCS, along with its associated regional growth forecast for the SCAG region and its subregions. The Project Site is located within the Los Angeles Subregion.

(b) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

In April 2016, SCAG's Regional Council adopted the 2016–2040 RTP/SCS. The 2016–2040 RTP/SCS presents the transportation vision for the region through the year 2040 and provides a long-term investment framework for addressing the region's transportation and related challenges. The 2016–2040 RTP/SCS contains baseline projections of population, households, and employment at the regional, county, and local jurisdictional levels. The 2016 RTP/SCS identifies the amount of expected growth in the region and provides the expected distribution of that growth, which reflects goals cited in the 2016 RTP/SCS. These goals seek to align the plan investments and policies with improving regional economic development and competitiveness; maximize mobility and accessibility; ensure travel safety and reliability for all people and goods in the region; preserve and ensure a sustainable regional transportation system; maximize productivity of

the transportation system; protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking); actively encourage and create incentives for energy efficiency, where possible; encourage land use and growth patterns that facilitate transit and non-motorized transportation; and maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.

The 2016–2040 RTP/SCS recognizes the need to provide an integrated approach to protect, maximize the productivity of, and strategically expand the region's transportation system. An important component of this strategy is "Smart Growth[1]." SCAG has been attempting to integrate land use and transportation by working with subregions and local communities to increase development densities near transit and improve the jobs/housing balance. Smart growth land use strategies encourage walking, biking, and transit use, thereby reducing vehicular demand, saving travel time, reducing pollution, and ultimately improving health.

A component of the SCAG strategy has been to focus new growth in High-Quality Transit Areas (HQTAs). HQTAs are defined as areas located within 0.5 mile of a fixed guideway transit stop or bus transit corridor. While HQTAs account for only 3 percent of the total land area in SCAG's region, HQTAs are expected to accommodate 46 percent and 55 percent of future household and employment growth, respectively, between 2012 and 2040.

On September 1, 2020, SCAG's Regional Council adopted an updated RTP/SCS known as the 2020–2045 RTP/SCS or Connect SoCal.[2] 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. Because the 2020–2045 RTP/SCS was adopted by SCAG subsequent to circulation of the Notice of Preparation (NOP) for the Project, both SCAG's 2016–2040 RTP/SCS and 2020–2045 RTP/SCS are discussed further below.

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1 *Smart growth is an approach to development that encourages a mix of land uses, diverse housing and transportation options, development within existing neighborhoods, and community engagement. See "Smart Growth Principles" in SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, pp. 174–175.*

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

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

(c) Regional Housing Needs Assessment (RHNA)

The RHNA is a key tool for SCAG and its member governments to plan for growth. The RHNA identifies the housing needs for very low income, low income, moderate income, and above moderate-income groups, and allocates these targets among the local jurisdictions that comprise SCAG. The most recent RHNA allocation, the "5th Cycle RHNA Allocation Plan," was adopted by SCAG's Regional Council on October 4, 2012. This allocation identifies housing needs from the planning period of October 2013 to October 2021.[4] Local jurisdictions are required by State law to update their General Plan Housing Elements based on the most recently adopted RHNA allocation. 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. SCAG is in the process of developing the 6th cycle RHNA allocation plan which will cover the planning period October 2021 through October 2029.[5]

(3) Local

(a) City of Los Angeles General Plan

The City of Los Angeles General Plan was prepared pursuant to State law to guide future development and to identify the community's environmental, social, and economic goals. The General Plan sets forth goals, objectives, and programs to provide a guideline for day-to-day land use policies and to meet the existing and future needs and desires of the community, while at the same time integrating a range of State-mandated elements including Land Use, Circulation (Mobility Plan 2035), Housing, Conservation, Open Space, Safety and Noise. The City's General Plan also includes the General Plan Framework Element, discussed below, and a series of community plans, which guide land use at the community level. As discussed in more detail below, the Project Site is located in the West Los Angeles Community Plan area.

(b) Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element), adopted in December 1996 and readopted in August 2001, sets forth general guidance and policies regarding land use issues for the City. The Framework Element focuses on providing strategies that encourage growth in a number of higher-intensity commercial and

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[4] *Given the Project's horizon year of 2023, the Project would not build any new residential units that would fall within the horizon of the current 5th Cycle Regional Housing Needs Assessment.*

[5] *SCAG, Regional Housing Needs Assessment (RHNA) & Housing, www.scag.ca.gov/programs/Pages/Housing.aspx, accessed June 20, 2021.*

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 defined therein. However, the Framework Element acknowledges 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 identified target areas but does not require that future development and growth be limited to those 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:

Objective 4.1: Plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types within each City subregion to meet the projected housing needs by income level of the future population to the year 2010.

Project consistency with the Framework Element is addressed in Section IV.E, Land Use and Planning, of this Draft EIR.

(c) Los Angeles General Plan Housing Element (Housing Element)

The Housing Element of the General Plan is prepared pursuant to State law and provides planning guidance in meeting the housing needs identified in SCAG's RHNA. The Housing Element identifies the City's housing conditions and needs, establishes the goals, objectives, and policies that are the foundation of the City's housing and growth strategy, and provides the array of programs the City intends to implement to create sustainable, mixed-income neighborhoods. The 2013–2021 Housing Element, based on the updated 2012 RHNA, was adopted by the City Council on December 3, 2013. The following Housing Element objectives and policies are relevant to the Project:

- Objective 1.1: Produce an adequate supply of rental and ownership housing to meet current and project needs.
- Policy 1.1.3: Facilitate new construction and preservation of a range of different housing types that address the particular needs of the city's households.
- Objective 1.3: Forecast and plan for changing housing needs over time in relation to production and preservation needs.
- Policy 1.3.5: Provide sufficient land use and density to accommodate an adequate supply of housing units by type and cost within the City to meet the

projections of housing needs, according to the policies and objectives of the City's Framework Element of the General Plan.

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

The Housing Element carries forward the goals of the Framework Element Housing chapter to encourage the development of livable neighborhoods and preservation of the housing supply.

Chapter 1, Housing Needs Assessment, identifies the City's share of the housing needs established in the RHNA. In particular, Table 1.29, City of Los Angeles Regional Housing Needs Assessment Allocation, indicates that the City's needs assessment allocation includes 82,002 housing units.[6] The identified housing needs represent targets to be met and do not establish development caps. The allocation of 82,002 housing units represents one-fifth of the total need of 412,721 housing units identified for the six-county SCAG region. The percentage increased from the previous housing needs cycle and City proportion, which was one-sixth of the regional need.

The Housing Element also establishes quantifiable objectives regarding the number of new housing units it anticipates being constructed. The Housing Element's objective for new housing citywide by 2021 is 59,559 housing units. The Housing Element of the City's General Plan functions as a guiding document for the City's housing policy between 2013 and 2021. Although the Project's horizon year of 2023 is beyond the scope of the current Housing Element, future housing policy, including an updated Housing Element, can be anticipated to address growth beyond 2021.

(d) West Los Angeles Community Plan

The Land Use Element of the City's General Plan includes 35 Community Plans. The City's Community Plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The Community Plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The City's Community Plans implement the City's General Plan Framework Element at the local

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

level. Per State law, each Community Plan must be consistent with the other elements and components of the General Plan and, thus, incorporates information from these plans.

As discussed in Section II, Project Description, of this Draft EIR, the Project is located within the West Los Angeles Community Plan area. The West Los Angeles Community Plan, adopted on July 27, 1999, includes the following objectives and policies that are relevant to population and housing:

- Policy 1-2.2: Locate senior citizen housing within reasonable walking distance of health and community facilities, services and public transportation.
- Objective 1-4: To promote adequate and affordable housing and increase its accessibility to more segments of the population, especially students and senior citizens.
- Policy 1-4.3: Encourage multiple residential development in specified commercial zones.

The Department of City Planning is currently updating the West Los Angeles Community Plan in conjunction with the Palms-Mar Vista-Del Rey, Venice, and Westchester–Playa Del Rey Community Plans, whose areas together make up the Westside of Los Angeles.[7]

(e) L.A.'s Green New Deal (Sustainable City pLAn 2019)

In April 2019, Mayor Eric Garcetti released L.A.'s Green New Deal (Sustainable City pLAn 2019), a program of actions designed to create sustainability-based performance targets through 2050 in order to advance economic, environmental, and equity objectives. L.A.s Green New Deal is the first four-year update to the City's first Sustainable City pLAn that was released in 2015. It augments, expands, and elaborates in even more detail the City's vision for a sustainable future and it tackles the climate emergency with accelerated targets and new aggressive goals.

The Housing & Development chapter of the Green New Deal includes the following targets for the number of new housing units to be provided within the City:

- Ensure 57 percent of new housing units are built within 1,500 feet of transit by 2025; and 75 percent by 2035.

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[7] *City of Los Angeles, Planning the Westside, https://planning.lacity.org/plans-policies/community-plan-update/planning-westside, accessed June 20, 2021.*

- Increase cumulative new housing unit construction to 150,000 by 2025; and 275,000 units by 2035.

- Create or preserve 50,000 income-restricted affordable housing units by 2035 and increase stability for renters.

(f) Rent Stabilization Ordinance and Ellis Act

The City's Rent Stabilization Ordinance (RSO) was adopted in 1979 to protect tenants from excessive rents, while at the same time allowing landlords a reasonable return on their investments.[8] The existing units on the Project Site are subject to the RSO.

The RSO implements the Ellis Act for the City, which was adopted in 1986 and sets forth specific requirements on how RSO units are to be withdrawn from the rental market, including requirements related to tenant notice and relocation assistance.[9]

b. Existing Conditions

(1) Population

(a) Regional Conditions

As shown in Table IV.G-1 on page IV.G-9, SCAG's 2016–2040 RTP/SCS growth forecast shows the population estimate for the SCAG Region in 2019 is approximately 19,260,875 people.[10] By 2023 (the Project buildout year), the population estimates for the SCAG Region in the 2016–2040 RTP/SCS were forecast to increase to approximately 19,813,200 people,[11] an increase of 2.87 percent or approximately 552,325 people.

As shown in Table IV.G-2 on page IV.G-10, based on SCAG's 2020–2045 RTP/SCS, growth forecast shows the population estimate for the SCAG Region in 2019 is

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[8] *HCID RSO Overview: https://hcidla2.lacity.org/residents/rso-overview, accessed June 20, 2021.*

[9] *Refer to Government Code Sections 7060-7060.7 for additional details regarding the Ellis Act.*

[10] *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) ÷ 8) + 19,126,750 = 19,260,875.*

[11] *The 2023 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 2020: ((21,486,000 – 19,395,000) ÷ 15) + 19,673,800 = 19,813,200.*

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

Year	Population	Households	Employment
SCAG			
2019[a]	19,260,875	6,348,750	8,373,625
2023[b]	19,813,200	6,566,400	8,720,000
2019 to 2023 Difference	552,325	217,650	346,375
Percent Change	**2.87%**	**3.43%**	**4.14%**
City of Los Angeles[c]			
2019	4,036,475	1,416,700	1,814,575
2023	4,145,604	1,468,814	1,882,104
2019 to 2023 Difference	109,129	52,114	67,529
Percent Change	**2.70%**	**3.68%**	**3.72%**

[a] *Population, households, and employment forecast for SCAG region in 2019 calculated based on linear interpolation of 2012 and 2020 values.*

[b] *Population, households, and employment forecast for SCAG region in 2023 calculated based on linear interpolation of 2020 and 2035 values.*

[c] *Population, households, and employment forecast for City of Los Angeles in 2019 and 2023 based on linear interpolations of 2012 and 2040 values.*

Source: SCAG 2016–2040 RTP/SCS; Eyestone Environmental, 2021.

approximately 19,346,500 people.[12] By 2023, the population estimates for the SCAG Region in the 2020–2045 RTP/SCS have been forecast to increase to approximately 19,908,900 people,[13] an increase of 2.91 percent or approximately 562,400 people.

(b) City of Los Angeles

As provided in Table IV.G-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.[14] By 2023, the population estimates for the City of Los Angeles in the 2016–2040 RTP/SCS

[12] *The 2019 extrapolated value is calculated using SCAG's 2016 and 2020 values to find the average increase between years and then applying that annual increase to 2016: ((19,518,000 – 18,832,000) ÷ 4) + 19,175,000 = 19,346,500.*

[13] *The 2023 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 2020: ((20,821,000 – 19,518,000) ÷ 10) + 19,778,600 = 19,908,900.*

[14] *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) ÷ 28) * 7] + 3,845,500 = 4,036,475.*

Table IV.G-2
SCAG 2020–2045 RTP/SCS Forecast

Year	Population	Households	Employment
SCAG			
2019[a]	19,346,500	6,252,750	8,618,500
2023[b]	19,908,900	6,504,000	8,877,700
2019 to 2023 Difference	562,400	251,250	259,200
Percent Change	**2.91%**	**4.02%**	**3.01%**
City of Los Angeles[c]			
2019	4,020,438	1,411,069	1,878,052
2023	4,135,955	1,469,828	1,917,721
2019 to 2023 Difference	115,517	58,759	39,669
Percent Change	**2.87%**	**4.16%**	**2.11%**

[a] *Population, households, and employment forecast for SCAG region in 2019 calculated based on linear interpolation of 2016 and 2020 values.*

[b] *Population, households forecast for SCAG region in 2023 calculated based on linear interpolation of 2020 and 2030 values.*

[c] *Population, households, and employment forecast for City of Los Angeles in 2019 and 2023 based on linear interpolations of 2016 and 2045 values.*

Source: SCAG 2020–2045 RTP/SCS; Eyestone Environmental, 2021.

were forecast to increase to approximately 4,145,604 people,[15] an increase of 2.70 percent or approximately 109,129 people.

As provided in Table IV.G-2, based on SCAG's 2020–2045 RTP/SCS, growth forecast shows the population estimate for the City of Los Angeles in 2019 is approximately 4,020,438 people.[16] By 2023, the population estimates for the City of Los Angeles in the 2020–2045 RTP/SCS have been forecast to increase to approximately 4,135,955 people,[17] an increase of 2.87 percent or approximately 115,517 people.

[15] *The 2023 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: [((4,609,400 – 3,845,500) ÷ 28) * 11] + 3,845,500 = 4,145,604.*

[16] *The 2019 extrapolated value is calculated using SCAG's 2016 and 2045 for the City of Los Angeles values to find the average increase between years and then applying that annual increase to 2016: [((4,771,300 – 3,933,800) ÷ 29) * 3] + 3,933,800 = 4,020,438.*

[17] *The 2023 extrapolated value is calculated using SCAG's 2016 and 2045 values for the City of Los Angeles to find the average increase between years and then applying that annual increase to 2016: [((4,771,300 – 3,933,800) ÷ 29) * 7] + 3,933,800 = 4,135,955.*

(c) Project Site

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with three multi-family residential developments totaling 112 units, including 95 studio units, 15 one-bedroom units, and two two-bedroom units. Based on the generation rates provided by the City of Los Angeles VMT Calculator Documentation, it is estimated that the existing 112 multi-family residential units could house approximately 252 people.[18] It is noted that this estimate is conservative given the types and sizes of units currently on the Project Site (mostly studio and one-bedroom units approximately 275 to 375 square feet in size).

(2) Housing

(a) Regional Conditions

As summarized in Table IV.G-1 on page IV.G-9, SCAG's 2016–2040 RTP/SCS regional growth forecast projects approximately 6,348,750 households in the SCAG Region in 2019.[19] By 2023, the number of households is expected to increase to approximately 6,566,400 households,[20] an increase of 3.43 percent or approximately 217,650 households.

As summarized in Table IV.G-2 on page IV.G-10, based on SCAG's 2020–2045 RTP/SCS, regional growth forecast projects approximately 6,252,750 households in the SCAG Region in 2019.[21] By 2023, the number of households is expected to increase to approximately 6,504,000 households,[22] an increase of 4.02 percent or approximately 251,250 households.

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[18] *Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the generation rate 2.25 persons per unit for "Multi-Family Residential" land use is applied to the 112 existing residential units.*

[19] *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) ÷ 8) + 6,282,500 = 6,348,750.*

[20] *The 2023 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) ÷ 15) + 6,515,933 = 6,566,400.*

[21] *The 2019 extrapolated value is calculated using SCAG's 2016 and 2020 values for the SCAG region to find the average increase between years and then applying that annual increase to 2016: ((6,333,000 – 6,012,000) ÷ 4) + 6,172,500 = 6,252,750.*

[22] *The 2023 extrapolated value is calculated using SCAG's 2020 and 2030 values for the SCAG region to find the average increase between years and then applying that annual increase to 2020: ((6,903,000 – 6,333,000) ÷ 10) + 6,447,000 = 6,504,000.*

(b) City of Los Angeles

Based on SCAG's 2016–2040 RTP/SCS growth forecast, as provided in Table IV.G-1 on page IV.G-9, approximately 1,416,700 households are projected in the City of Los Angeles in 2019.[23] By 2023, the number of households is expected to increase to increase to approximately 1,468,814 households,[24] an increase of 3.68 percent or approximately 52,114 households.

As provided in Table IV.G-2 on page IV.G-10, based on SCAG's 2020–2045 RTP/SCS, regional growth forecast projects approximately 1,411,069 households in the City of Los Angeles in 2019.[25] By 2023, the number of households is expected to increase to approximately 1,469,828 households,[26] an increase of 4.16 percent or approximately 58,759 households.

(c) Project Site

As previously noted, the Project Site is currently developed with three multi-family residential developments comprising a total of 112 housing units, including 95 studio units, 15 one-bedroom units, and two two-bedroom units. The existing on-site units are subject to the RSO.

(3) Employment

(a) Los Angeles Regional and County Conditions

The Southern California region is one of the nation's largest and most dynamic regional economies, and it accounts for about half the jobs and population in the state. Its $1.042 trillion gross regional product ranks as the 16th largest in the world—between

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[23] *The 2019 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) ÷ 28) * 7] + 1,325,500 = 1,416,700.*

[24] *The 2023 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) ÷ 28) * 11] + 1,325,500 = 1,468,814.*

[25] *The 2019 extrapolated value is calculated using SCAG's 2016 and 2045 values for the City of Los Angeles to find the average increase between years and then applying that annual increase to 2016: [((1,793,000 – 1,367,000) ÷ 29) * 3] + 1,367,000 = 1,411,069.*

[26] *The 2023 extrapolated value is calculated using SCAG's 2016 and 2045 values for the City of Los Angeles to find the average increase between years and then applying that annual increase to 2016: [((1,793,000 – 1,367,000) ÷ 29) * 7] + 1,367,000 = 1,469,828.*

Mexico and Indonesia.[27] The four cornerstones that support the region's economy, which is now much more diversified than in the past, are: (1) international trade, primarily through Los Angeles International Airport and the Ports of Los Angeles, Long Beach and Port Hueneme; (2) the nation's largest entertainment and tourism sector; (3) the nation's largest diversified manufacturing sector; and (4) growing professional services, biotechnology, and design markets.[28]

(b) Regional Conditions

As summarized in Table IV.G-1 on page IV.G-9, SCAG's 2016–2040 RTP/SCS regional growth forecast projects approximately 8,373,625 jobs in the SCAG Region in 2019.[29] By 2023, the number of jobs is expected to increase to approximately 8,720,000 jobs,[30] an increase of 4.14 percent or approximately 346,375 jobs.

As shown in Table IV.G-2 on page IV.G-10, based on SCAG's 2020–2045 RTP/SCS, regional growth forecast projects approximately 8,618,500 jobs in the SCAG Region in 2019.[31] By 2023, the number of jobs is expected to increase to approximately 8,877,700 jobs,[32] an increase of 3.01 percent or approximately 259,200 jobs.

(c) City of Los Angeles

Based on SCAG's 2016–2040 RTP/SCS growth forecast, as provided in Table IV.G-1, approximately 1,814,575 jobs are projected in the City of Los Angeles

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[27] *Los Angeles County Economic Development Corporation (LAEDC), 2016–17 Economic Forecast and Industry Outlook, Table 4, p. 25, February 2016.*

[28] *Los Angeles County Economic Development Corporation (LAEDC), 2016–17 Economic Forecast and Industry Outlook, February 2016.*

[29] *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: ((8,507,000 – 7,440,000) ÷ 8) + 8,240,250 = 8,373,625.*

[30] *The 2023 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: ((9,572,000 – 8,507,000) ÷ 15) + 8,649,000 = 8,720,000.*

[31] *The 2019 extrapolated value is calculated using SCAG's 2016 and 2020 values for the SCAG region to find the average increase between years and then applying that annual increase to 2016: ((8,695,000 – 8,389,000) ÷ 4) + 8,542,000 = 8,618,500.*

[32] *The 2023 extrapolated value is calculated using SCAG's 2020 and 2030 values for the SCAG region to find the average increase between years and then applying that annual increase to 2020: ((9,304,000 – 8,695,000) ÷ 10) + 8,816,800 = 8,877,700.*

in 2019.[33] By 2023, the number of jobs is expected to increase to approximately 1,882,104 jobs,[34] an increase of 3.72 percent or approximately 67,529 jobs.

As shown in Table IV.G-2 on page IV.G-10, based on SCAG's 2020–2045 RTP/SCS, regional growth forecast projects approximately 1,878,052 jobs in the City of Los Angeles in 2019.[35] By 2023, the number of jobs is expected to increase to approximately 1,917,721 jobs,[36] an increase of 2.11 percent or approximately 39,669 jobs.

(d) Project Site

As discussed above and as previously noted, the Project Site is currently developed with three multi-family residential developments comprising a total of 112 housing units, including 95 studio units, 15 1-bedroom units, and two 2-bedroom units. As such, existing uses on-site do 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?

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[33] *The 2019 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: [((2,169,100 – 1,696,400) ÷ 28) * 7] + 1,696,400 = 1,814,575.*

[34] *The 2023 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: [((2,169,100 – 1,696,400) ÷ 28) * 11] + 1,696,400 = 1,882,104.*

[35] *The 2019 extrapolated value is calculated using SCAG's 2016 and 2045 values for the City of Los Angeles to find the average increase between years and then applying that annual increase to 2016: [((2,135,900 – 1,848,300) ÷ 29) * 3] + 1,848,300 = 1,878,052.*

[36] *The 2023 extrapolated value is calculated using SCAG's 2016 and 2045 values for the City of Los Angeles to find the average increase between years and then applying that annual increase to 2016: [((2,135,900 – 1,848,300) ÷ 29) * 7] + 1,848,300 = 1,917,721.*

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 (Thresholds Guide), as appropriate, to assist in answering the Appendix G Threshold questions.

The LA CEQA Thresholds Guide identifies the following criteria that can be considered to evaluate population and housing growth on a case-by-case basis:

- 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, United States Department of Housing and Urban Development Consolidated Plan and Comprehensive Housing Affordability Strategy policies, redevelopment plan, RSO, and the Regional Comprehensive Plan and Guide (RCP&G).

As provided in the impact analysis below, the Project's potential impacts related to inducing substantial unplanned population growth were fully evaluated in the Initial Study. As such, the factors and considerations from Section J.1 of the City's L.A. CEQA Thresholds Guide relative to unplanned population growth are not applicable.

b. Methodology

As evaluated below, the Project's potential impacts related to population and housing that are considered in this section of the Draft EIR relate to the displacement of substantial number of existing people or housing, necessitating the construction of replacement housing elsewhere. As such, this analysis considers the number of housing units displaced by the Project and any features included as part of the Project to assist existing residents with relocation.

c. Project Design Features

No specific project design features are proposed with regard to population and 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)?

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, the Project would remove three existing multi-family residential developments with a total of 112 residential units and would construct 192 senior housing residential units. The Project would result in a net increase of 80 residential units compared to existing conditions. The proposed type of units is not typically associated with a substantial increase in population growth, but rather serving the need for senior housing. Therefore, as determined in the Initial Study, the Project would not induce substantial population growth in the area. With regard to infrastructure, all circulation improvements planned as part of the Project are intended to improve circulation flows and safety throughout the Project Site and vicinity. Any utility and other infrastructure improvements that may be required by the Project would be necessary to connect the proposed uses to the existing main infrastructure system. As determined in the Initial Study, the Project also would not indirectly induce substantial unplanned population growth in the area. **Therefore, impacts with respect to Threshold (a) would be less than significant. No further analysis is required.**

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

(1) Impact Analysis

The Project Site is currently developed with three multi-family residential developments with a total of 112 units that would be removed as part of the Project. Based on the generation rates provided by the City of Los Angeles VMT Calculator Documentation and 112 units, the existing multi-family residential buildings could house approximately 252 people.[37] As previously noted, this estimate is conservative given the types and sizes of units currently on the Project Site (mostly studio and one-bedroom units approximately 275 to 375 square feet in size). The actual number of existing persons on the Project Site would likely be less than that estimated by the use of the City's general

[37] *Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the generation rate 2.25 persons per unit for "Multi-Family Residential" land use is applied to the 112 existing residential units.*

household rate. Notwithstanding, the Project would displace 112 existing multi-family residential units and the associated residents of those units.

The Project would construct 192 senior housing residential units in an eldercare facility, including 71 senior-independent dwelling units, 75 assisted living guest rooms, and 46 memory care guest rooms. The Project would result in a net increase of 80 residential units (192 proposed units – 112 existing units to be removed). As an eldercare facility, the Project would provide a specific type of residential use as compared to the existing multi-family residential buildings at the Project Site. Eldercare facilities serve a senior population with certain regulated care requirements while the existing residential units are not age-restricted nor providing senior community care services. Thus, residents will be displaced due to the demolition of the existing multi-family residential buildings. As discussed above, the existing on-site units are subject to the RSO. The Project would be required to comply with the applicable provisions of the RSO and the Ellis Act. Furthermore, the types and sizes of units currently on the Project Site are mostly studio and one-bedroom units (approximately 275 to 375 square feet in size). As such, the household size of the existing units is likely closer to one person per unit with a resulting on-site residential population of approximately 112 persons. Therefore, although the Project would displace existing residents, the Project would increase the overall availability of residential units and the overall residential population on-site upon Project completion. Therefore, the displacement would not be considered substantial requiring the construction of replacement housing elsewhere. Additionally, it is anticipated that senior residents will vacate their current residential housing elsewhere to move to the Project Site upon completion of the Project, thereby providing for the availability of other housing elsewhere. **As such, Project-level impacts with regard to displacing a substantial number of existing people or housing would be less than significant.**

(2) Mitigation Measures

Project-level impacts with regard to displacing a substantial number of existing people or housing would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation Measures

Project-level impacts with regard to displacing a substantial number of existing people or housing were determined to be less than significant without mitigation. Therefore, no mitigation measures are required or included, and the impact level remains less than significant.

e. Cumulative Impacts

(1) Impact Analysis

As identified in Section III, Environmental Setting, of this Draft EIR, six related projects in the surrounding area are assumed to be constructed and/or operational during the same time period as the Project. It is noted that some of the related projects may not be built out by 2023, may never be built, or may be approved and built at reduced densities.

With regard to the displacement of existing persons and housing, Related Project Nos. 1, 2, 4, 5, and 6 would not involve the displacement of existing persons or housing.[38,39,40,41,42] Therefore, these related projects would not combine with the Project to result in a significant impact related to the displacement of persons or housing. In addition, Related Project Nos. 1, 4, and 5 would involve the construction of additional housing, which would serve to meet the demand for additional housing in the area and in the City as a whole.

Related Project No. 3, located at 10306 W. Santa Monica Boulevard, would involve the demolition and removal of five existing multi-family residential apartment buildings with a total of 26 residential units.[43] However, as discussed in the Categorical Exemption prepared for Related Project No. 3, this related project would develop 91 to 116 residential units. Although Related Project No. 3 would displace existing residents, the proposed related project would increase the overall availability of housing units on-site a net total of 65 to 90 residential units upon buildout. In addition, as discussed above, other related projects in the area have proposed the development of additional housing, which would serve to meet the demand for additional housing in the area. Therefore, the displacement of persons and housing associated with Related Project No. 3 and the Project would not result in a significant cumulative impact.

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[38] *City of Los Angeles. Department of City Planning. New Century Plan Draft EIR, https://planning.lacity.org/eir/CenturyPlan/DEIR/issues/home.htm, June 20, 2021.*

[39] *City of Los Angeles. Department of City Planning. Century City Center Draft EIR, http://planning.lacity.org/eir/CenturyCityCenter/DEIR/index.html, accessed June 20, 2021.*

[40] *City of Los Angeles. Department of City Planning. Century Plaza Mixed-Use Development Final EIR, https://planning.lacity.org/eir/CenturyPlazaMixedDevelopment/feir/index.html, accessed June 20, 2021.*

[41] *City of Los Angeles Department of City Planning. 10400 Santa Monica Boulevard Categorical Exemption.*

[42] *City of Los Angeles. Department of City Planning. Fox Studios Master Plan Initial Study.*

[43] *City of Los Angeles, Department of City Planning, 10306–10330 Santa Monica Boulevard Categorical Exemption.*

(2) Mitigation Measures

Cumulative impacts with regard to population and housing would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Cumulative impacts with regard to population and housing were determined to be less than significant without mitigation. Therefore, no mitigation measures are required or included, and the impact level remains less than significant.