

# IV. Environmental Impact Analysis

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## H. Population and Housing

### 1. Introduction

This section analyzes the potential effects of the Project's contribution to population and housing growth within the geographical boundaries of the City of Los Angeles (City), taking into account population and housing policies established in the Central City Community Plan (Community Plan). Project effects on these demographic characteristics are compared to adopted and growth forecasts and relevant policies and programs regarding planning for future development to determine whether the Project would be inconsistent with adopted growth forecasts in a way that could result in negative environmental effects associated with unplanned growth. Supporting documentation including calculations of cumulative population and housing growth is provided in Appendix H, Population, Housing, and Employment Data, of this Draft EIR. The employment analysis is also, in part, based on the Economic and Fiscal Impact Analysis prepared for the Project by RCLCO, dated March 8, 2022. This report is also provided in Appendix H of this Draft EIR. To evaluate impacts related to population and housing associated with construction and operation of the Project, information from the Southern California Association of Governments' (SCAG) population, housing, and employment growth forecasts for the City of Los Angeles (City) and SCAG Region were used. Related information regarding the effects of the new development on the relationship between land uses and resulting land use patterns is further addressed in Section IV.F, *Land Use and Planning*. Potential growth-inducing impacts of the Project are further addressed in Chapter VI, *Other CEQA Considerations*.

### 2. Environmental Setting

#### a) Regulatory Framework

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

- Housing Element Law: California Government Code Section 65583 and 65584(a)(1)
- The Sustainable Communities and Climate Protection Act of 2008 (Senate Bill [SB] 375, Steinberg)
- Housing Crisis Act of 2019 – (SB 330, Skinner)
- Fair Employment and Housing Act

- The Unruh Civil Rights Act
- Southern California Association of Governments
  - Regional Transportation Plan/Sustainable Communities Strategy
  - Regional Housing Needs Assessment
- City of Los Angeles General Plan
  - General Plan Framework Element
  - General Plan Housing Element
- Central City Community Plan
- Green New Deal
- Greater Downtown Housing Incentive Area
- Los Angeles Municipal Code
- Affordable Housing and Labor Standards Initiative (Proposition JJJ)
- Transit Oriented Communities Affordable Housing Incentive Program
- Affordable Housing Linkage Fee Ordinance
- Affordable Housing Trust Fund
- Density Bonus Ordinance
- Homelessness Reduction and Prevention, Housing, and Facilities Bond (Proposition HHH)
- Residential Hotel Unit Conversion and Demolition Ordinance
- Rent Stabilization Ordinance
- Development Guidelines and Controls for City Center and Central Industrial Redevelopment Project Areas

## (1) State

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

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

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 375, Steinberg)*

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

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

As discussed further below, on September 3, 2020, SCAG adopted its Connect SoCal: The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-

2045 RTP/SCS), which is an update to the previous 2016-2040 RTP/SCS.<sup>1</sup> Using growth forecasts and economic trends, the 2020-2040 RTP/SCS provides a vision for transportation throughout the region for the next 25 years that achieves the statewide reduction targets; and in so doing identifies the amount and location of growth expected to occur within the region.

(c) *Housing Crisis Act of 2019 – (SB 330, Skinner)*

On October 9, 2019, Governor Newsom signed into law the Housing Crisis Act of 2019 (SB 330). SB 330 seeks to speed up housing production in the next half decade by eliminating some of the most common entitlement impediments to the creation of new housing, including delays in the local permitting process and cities enacting new requirements after an application is complete and undergoing local review—both of which can exacerbate the cost and uncertainty that sponsors of housing projects face. In addition to speeding up the timeline to obtain building permits, the bill prohibits local governments from reducing the number of homes that can be built through down-planning or down-zoning or the introduction of new discretionary design guidelines. The bill is in effect as of January 1, 2020 but is temporary in nature as the bill’s provisions expire on January 1, 2025.

(d) *Fair Employment and Housing Act*

The Fair Employment and Housing Act (FEHA) of 1959 (Government Code Section 12900 et seq.) prohibits housing discrimination on the basis of race, color, religion, sexual orientation, marital status, national origin, ancestry, familial status, disability, or source of income.

(e) *The Unruh Civil Rights Act*

The Unruh Civil Rights Act of 1959 (Civil Code Section 51) prohibits discrimination in “all business establishments of every kind whatsoever.” The provision has been interpreted to include businesses and persons engaged in the sale or rental of housing accommodations.

## (2) Regional

(a) *Southern California Association of Governments*

The City of Los Angeles is located within the jurisdiction of SCAG, a Joint Powers Agency established under California Government Code Section 6502 et seq. Pursuant to federal and State law, as discussed above, SCAG serves as a Council of Governments, a Regional Transportation Planning Agency, and the (Metropolitan Planning Organization (MPO) for Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial Counties. SCAG’s mandated responsibilities include developing plans and policies with respect to the region’s population growth, transportation programs, air quality, housing,

<sup>1</sup> Southern California Association of Governments (SCAG), *Connect SoCal: 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy*, September 3, 2020.

and economic development. Specifically, SCAG is responsible for preparing the RTP/SCS and RHNA, in coordination with other State and local agencies. These documents include population, employment, and housing projections for the region and its 15 subregions. The City of Los Angeles is located within the Los Angeles Subregion.

SCAG is tasked with providing demographic projections for use by local agencies and public service and utility agencies in determining future service demands. Projections in the SCAG RTP/SCS serve as the basis for demographic estimates in this analysis of Project consistency with growth projections. The findings regarding growth in the region are consistent with the methodologies prescribed by SCAG and reflect SCAG goals and procedures.

SCAG data is periodically updated to reflect changes in development activity and actions of local jurisdictions (e.g., zoning changes). Through these updates, public agencies have advance information regarding changes in growth that must be addressed in planning for their provision of services. Changes in the growth rates are reflected in the new projections for service and utilities planning through the long-term time horizon.

*(b) Regional Transportation Plan/Sustainable Communities Strategy*

Pursuant to Government Code Section 65080(b)(2)(B), SCAG must prepare a RTP/SCS which (1) identifies the general location of uses, residential densities, and building intensities within the region; (2) identify areas within the region sufficient to house all the population of the region over the course of the planning period of the regional transportation plan taking into account net migration into the region, population growth, household formation and employment growth; (3) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region pursuant to Government Code Section 65584; (4) identify a transportation network to service the transportation needs of the region; (5) gather and consider the best practically available scientific information regarding resource areas and farmland in the region; and (6) consider the state housing goals specified in Sections 65580 and 65581, (7) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the GHG emissions from automobiles and light trucks to achieve the GHG reduction targets approved by the state board, and (8) allow the RTP to comply with air quality conformity requirements under the federal Clean Air Act.

On September 3, 2020, SCAG's Regional Council adopted the Connect SoCal 2020–2045 RTP/SCS. On October 30, 2020, CARB accepted SCAG's determination that the SCS would achieve GHG emission reduction targets. The 2020-2045 RTP/SCS meets federal and state requirements and is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The RTP/SCS contains baseline socioeconomic projections that serve as the basis for SCAG's transportation planning. It includes projections of population, households, and employment forecasted for the years 2020, 2030, 2035, and 2045 at the regional, county,

and local jurisdictional levels, and Traffic Analysis Zones (TAZ) that provide small area data for transportation modeling.<sup>2</sup> However, TAZ-level projections are utilized by SCAG for regional modeling purposes and are not adopted as part of Connect SoCal nor included as part of the Forecasted Regional Development Pattern.<sup>3</sup>

(c) *Regional Housing Needs Assessment*

SCAG prepares the RHNA mandated by State law so that local jurisdictions can use this information during their periodic update of the General Plan Housing Element. 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 RHNA addresses existing and future housing needs. The existing need for housing is determined using data from the most recent U.S. Census. The future need for housing is determined using data on forecasted household growth, historical growth patterns, job creation, household formation rates, and other factors. The need for new housing is distributed among income groups so that each community moves closer to the regional average income distribution. The most recent RHNA allocation, the “6th Cycle RHNA Allocation Plan,” was approved by the State Department of Housing and Community Development on March 22, 2021.<sup>4</sup> The City of Los Angeles was assigned a RHNA of 456,643 units for the 2021 to 2029 planning period. This allocation identifies housing needs for the planning period between October 2021 through October 2029. Local jurisdictions are required by State law to update their General Plan Housing Elements based on the most recently adopted RHNA allocation.

(3) Local

(a) *City of Los Angeles General Plan*

The City 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 Transportation, Noise, Safety, Housing, Open Space/Conservation, and Environmental Justice. The General Plan also includes the General Plan Framework Element (Framework Element), discussed below, and the Community Plan, which guides land use at the level of the community plan area.

<sup>2</sup> SCAG, *Connect SoCal: 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy*, September 3, 2020, Demographics & Growth Forecast Appendix.

<sup>3</sup> SCAG, *Connect SoCal: 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy*, September 3, 2020, Demographics & Growth Forecast Appendix, page 27.

<sup>4</sup> SCAG, *Final RHNA Allocation Methodology*, adopted March 5, 2020, page 5.

(i) *General Plan Framework Element*

The General Plan Framework (Framework Element) sets forth a Citywide comprehensive long-range growth strategy and defines Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services.<sup>5</sup> Framework Element land use policies are implemented at the community level through the City's Community Plans and Specific Plans.

The Framework Element also includes population, housing, and employment projections to guide future Community Plan amendments. However, the Framework Element makes clear that its population forecasts are estimates for guiding amendments: "... it [Framework Element] is not dependent upon these population levels or distributions for its implementation. It does not mandate specific levels of growth for any specific area (neither minimums nor caps)."<sup>6</sup>

The Framework Element Housing Chapter (Chapter 4) states that housing production has not kept pace with the demand for housing. According to the Framework Element, the City has insufficient vacant properties to accommodate the projected population growth and the supply of land zoned for residential development is constrained.<sup>7</sup> The Housing Chapter states that new residential development will require the recycling and/or intensification of existing developed properties.<sup>8</sup> The Framework Element states that the City must strive to meet the housing needs of the population in a manner that contributes to stable, safe, and livable neighborhoods, reduces conditions of overcrowding, and improves access to jobs and neighborhood services, particularly by encouraging future housing development near transit corridors and stations.<sup>9</sup> The Housing Chapter includes goals, objectives and policies to guide future development.<sup>10</sup> In particular, Policy 4.1.1 states that the City should "[p]rovide sufficient land use and density to accommodate an adequate supply of housing units by type and cost within each City subregion to meet the 20-year projections of housing needs." Objective 4.2 "[e]ncourage[s] 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."

<sup>5</sup> City of Los Angeles, *The Citywide General Plan Framework, An Element of the City of Los Angeles General Plan*, [https://planning.lacity.org/odocument/513c3139-81df-4c82-9787-78f677da1561/Framework\\_Element.pdf](https://planning.lacity.org/odocument/513c3139-81df-4c82-9787-78f677da1561/Framework_Element.pdf), adopted by the City Planning Commission on July 27, 1995, adopted by City Council on December 11, 1996, re-adopted on August 8, 2001.

<sup>6</sup> City of Los Angeles, *The Citywide General Plan Framework*, page 2-2.

<sup>7</sup> City of Los Angeles, *The Citywide General Plan Framework*, Housing Chapter, page 4-1.

<sup>8</sup> City of Los Angeles, *The Citywide General Plan Framework*, Housing Chapter, page 4-1.

<sup>9</sup> City of Los Angeles, *The Citywide General Plan Framework*, Housing Chapter, page 4-2.

<sup>10</sup> City of Los Angeles, *The Citywide General Plan Framework*, Housing Chapter, pages 4-4 and 4-6.

(ii) *General Plan Housing Element*

The General Plan Housing Element (Housing Element) 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 2021-2029 Housing Element, an update to the previous 2013-2021 Housing Element that is based on the updated 2012 RHNA, was adopted by the City Council on November 24, 2021.<sup>11</sup> Policies to note include Policy 1.2.2 that states the City should "[f]acilitate new construction of a range of different housing types that address the particular needs of the city's households."<sup>12</sup> Also, Policy 1.1.2 states that the City should "[p]lan for appropriate land use designations and density to accommodate an ample supply of housing units by type, cost, and size within the City to meet housing needs, according to Citywide Housing Priorities and the City's General Plan."<sup>13</sup> 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.

Further, Chapter 1, Housing Needs Assessment, identifies the City's share of the housing needs established in the RHNA. In particular, Table 1.27, Regional Housing Needs Assessment, indicates that the City's needs assessment allocation includes 456,643 housing units.<sup>14</sup> The identified housing needs represent targets to be met and do not establish development caps. The allocation of 456,643 housing units represents one-third of the total need of 1,341,827 housing units identified for the six-county SCAG region. The percentage increased from the previous housing needs cycle and City proportion, which was one-fifth of the regional need for the same types of units.

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 is 310,000 units.<sup>15</sup>

(b) *Central City Community Plan*

The Land Use Element of the City's General Plan includes 35 community plans. 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 community plans implement the City's Framework Element at the local level. The community plans consist

<sup>11</sup> City of Los Angeles, *Housing Element 2021-2029*.

<sup>12</sup> City of Los Angeles, *Housing Element 2021-2029*, Chapter 6, page 247.

<sup>13</sup> City of Los Angeles, *Housing Element 2021-2029*, Chapter 6, page 246.

<sup>14</sup> City of Los Angeles, *Housing Element 2021-2029*, page 98.

<sup>15</sup> City of Los Angeles, *Housing Element 2021-2029*, page 100.



of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities. 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. The Community Plan includes residential, commercial, and industrial objectives and policies that establish a development concept for its neighborhoods and districts. The Project Site is located within the Central City Community Plan area.

The Central City Community Plan includes residential and commercial objectives and policies that establish a development concept for its neighborhoods and districts. Key provisions regarding the development in the Project vicinity relevant to population, housing and employment include the following:<sup>16</sup>

(i) *Residential Objectives*

**Objective 1-2:** To increase the range of housing choices available to Downtown employees and residents.

**Objective 1-3:** To foster residential development which can accommodate of full range of incomes.

(ii) *Commercial Objectives*

**Objective 2-1:** To improve Central City's competitiveness as a location for offices, business, retail, and industry.

**Objective 2-3:** To promote land uses in Central City that will address the needs of all the visitors to Downtown for business, conventions, trade shows, and tourism.

**Objective 2-4:** To encourage a mix of uses which create an active, 24-hour downtown environment for current residents and which would also foster increase tourism.

The City is in the process of updating the Central City Community Plan, as well as the Central City North Community Plan. The City circulated a Notice of Preparation for the combined Environmental Impact Report for the updated Central City and Central City North Community plans in February 2017.<sup>17</sup> An updated draft of the Downtown Community Plan (DTLA 2040) was released in June 2021, along with drafts of the potential zoning and land use designations throughout the Community Plan area. On May 3, 2023, the Los Angeles City Council voted to adopt the DTLA 2040 Plan, however, it

<sup>16</sup> City of Los Angeles Department of City Planning, *Central City Community Plan*, page III-1, January 8, 2003.

<sup>17</sup> City of Los Angeles Department of City Planning, Notice of Preparation of a Combined Draft Environmental Impact Report and Notice of Scoping Meeting for Updates to the Central City and Central City North Community Plans, and Amendments to the City of Los Angeles Municipal Code to Adopt a New Zoning Code for the Central City and Central City North Community Plan Areas (as part of the Re:Code LA Project), February 6, 2017.

does not become effective until the City formally adopts an ordinance to implement the final version of the plan, the current draft version of which is subject to future amendments and/or revisions.

(c) *Green New Deal*

In April 2019, Mayor Eric Garcetti released the 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.<sup>18</sup> The Green New Deal is a mayoral initiative rather than an adopted plan and 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.
- 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.

(d) *Greater Downtown Housing Incentive Area*

The Greater Downtown Housing Incentive Area was established by Ordinance No. 179,076, effective September 23, 2007. Ordinance No. 179,076 was approved for the purpose of encouraging urban in-fill development in high quality transit areas (HQTAs); and it modified several code sections for projects within the Greater Downtown area. Among its provisions, it added a requirement that all projects comply with the Urban Design Standards and Guidelines;<sup>19</sup> it eliminated maximum unit per lot area density limits (within floor area ratio [FAR] limits); and amended the lot area criteria for purposes of calculating project density.

(e) *Los Angeles Municipal Code*

Zoning regulations provide for the types and densities of commercial, institutional, industrial, and residential uses permitted in each of the City's zones. Zoning in the City establishes the maximum allowable development in a zone. Zoning also includes height limitations and other development standards which together regulate setbacks, building heights, floor area ratios (FAR), open space and parking for each parcel within the City, as applicable.

<sup>18</sup> City of Los Angeles, *L.A.'s Green New Deal, Sustainable City pLAN*, 2019.

<sup>19</sup> Los Angeles Municipal Code Section 12.22, Subdivision 30, updated this reference to implement the standards and guidelines in the Downtown Design Guide.

The Los Angeles Municipal Code (LAMC) is currently undergoing a comprehensive update to all Zoning Code sections as part of the re:code LA effort. re:code LA, which started in 2013, will update the Zoning Code to make the Code more streamlined, visual, and easy to use. The existing Zoning Code will continue to be located in Chapter 1 of the LAMC, while the New Zoning Code will be located in a new Chapter 1A of the LAMC.

(f) *Affordable Housing and Labor Standards Initiative  
(Proposition JJJ)*

Proposition JJJ, approved on November 8, 2016, is a measure to impose affordable housing and local labor hiring requirements on new development projects, as well as set a minimum wage for hired construction workers. The measure included a number of key provisions. All development projects that include 10 or more residential units and require changes to the General Plan or other zoning are required to make a percentage of the units affordable to low-income and working residents or pay a fee to fund affordable housing and enforce laws that protect renters. Developers are required to make as much as 20 percent of the units in a project affordable for low-income and working renters. That number can be as high as 40 percent for homes that are for sale.

Developers of any such residential projects are required to hire contractors who:

- Are licensed according to city and state law;
- Guarantee to offer at least 30 percent of work-hours to city residents, with 10 percent coming from those living within five miles of the project;
- Pay standard wages for the area; and
- Employ members of apprenticeship training programs and workers with real-world experience.

Moreover, projects planned around public transit within a half mile of significant public transit stops are encouraged through an incentive program that applies only to projects that include affordable housing and require contractors to comply with the restrictions laid out in the bulleted list above.

(g) *Transit Oriented Communities Affordable Housing Incentive Program*

Pursuant to the voter-approved Measure JJJ, LAMC Section 12.22 A.31 was added to create the Transit Oriented Communities (TOC) Affordable Housing Incentive Program (TOC Program). The TOC Program provides incentives for developers to build affordable housing located within a one-half mile radius of major transit stops.<sup>20</sup> All development

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<sup>20</sup> Major Transit Stop is a site containing a rail station or the intersection of two or more bus routes with a service interval of 15 minutes or less during the morning and afternoon peak commute periods. The stations or bus routes may be existing, under construction or included in the most recent SCAG RTP.

projects that include 10 or more residential units and involve a zone change, general plan amendment, or height district change would be subject to the new requirements.

*(h) Affordable Housing Linkage Fee Ordinance*

The City Council adopted the Affordable Housing Linkage Fee (AHLF) Ordinance on December 13, 2017 and became effective on February 17, 2018, with a phased-in fee structure. The AHLF Ordinance places a fee on certain new market-rate residential and commercial developments to generate local funding for affordable housing. The fee amount is based on the fee schedule in effect at the time the building permit for a project is issued, and the market area within which it is located. Fees will be adjusted annually for inflation beginning July 1, 2019 using the Consumer Price Index (CPIU). The market areas may be updated by City Council every five years beginning July 1, 2023.

*(i) Affordable Housing Trust Fund*

The City created and administers the Affordable Housing Trust Fund (Fund), which is codified in the LAMC. The Fund establishes a special fund for the purpose of receiving and disbursing monies to address the affordable housing needs of the City. The Fund requires 25 percent of the received initial and continuing net revenue of the 2001 business tax and payroll expense tax amnesty program and the revenue program of the Revenue and Taxation Code Section 1955.1 (AB 63) be allocated to the Fund.

*(j) Density Bonus Ordinance*

The purpose of the City's Density Bonus Ordinance, codified as LAMC Section 12.22 A.25, is to establish procedures for implementing State Density Bonus requirements, as set forth in California Government Code Sections 65915-65918, and to increase the production of affordable housing, consistent with City policies. Subject to the provisions of LAMC Section 12.22 A.25, housing development projects that include an affordable housing component and senior citizen housing development projects may be granted a density bonus, allowing for a density increase over the otherwise maximum allowable residential density under the applicable zoning ordinance and/or specific plan. The density bonus is determined based on the percentage and type of restricted affordable housing units provided and shall not exceed 35 percent. The amount of parking required for these projects may also be reduced. In addition, a housing development project that qualifies for a density bonus may be granted incentives set forth in the ordinance that allow for modification to a City development standard or requirement.

*(k) Homelessness Reduction and Prevention, Housing, and Facilities Bond (Proposition HHH)*

Proposition HHH, approved on November 8, 2016, is a \$1.2 billion general obligation bond to finance the construction of supportive and affordable housing for homeless people in the City. The purpose of the bond is to provide safe, clean affordable housing for the homeless and for those in danger of becoming homeless, such as battered women and their children, veterans, seniors, foster youth, and the disabled; and provide facilities to increase access to mental health care, drug and alcohol treatment, and other services.

*(l) Residential Hotel Unit Conversion and Demolition Ordinance*

Per LAMC 47.71, the Residential Hotel Unit Conversion and Demolition Ordinance (RHO) prohibits conversion or demolition of dwelling units in a residential hotel without approval from the Housing + Community Investment Department (HCIDLA). The ordinance adds Article 7.1 to Chapter IV of the LAMC and amends Sections 91.106.4.1, 151.06, and 151.09. The ordinance seeks to preserve dwelling units provided by residential hotels, which often serve as affordable housing for the very low income, elderly, and disabled.

*(m) Rent Stabilization Ordinance*

The City's Rent Stabilization Ordinance (RSO) was established in response to the shortage of affordable housing in Los Angeles and went into effect May 1, 1979. The RSO's purpose is to regulate rents so as to safeguard tenants from excessive rent increases, while at the same time providing landlords with just and reasonable returns from their rental units. The RSO addresses allowable rent increases, the registration of rental units, legal reasons for eviction, and the causes for eviction requiring relocation assistance payment to the tenant. Properties subject to the RSO are those that are within the City limits, contain two or more units, and have a Certificate of Occupancy prior to October 1, 1978, as well as replacement units under LAMC Section 151.28. A complaint can be filed by any tenant who believes that an owner, manager, or agent has committed a violation of the RSO. The Housing and Community Investment Department oversees and enforces the RSO. The RSO comprises Chapter XV of the LAMC.

In 2017, two ordinances amending the RSO went into effect. The "Ellis Amendments" (Ordinance No. 184873) amended the RSO requirements for demolition or permanent withdrawal of RSO units. The amendments provide clarification on the applicability of RSO to both vacant and occupied units, the unit withdrawal process, and relocation service requirements. In addition, the amendments require that property owners file annual status reports on withdrawn properties and allow landlords to qualify for an exemption on newly constructed units where RSO units are demolished by providing a certain amount of affordable housing. The second amendment (Ordinance No. 184822) addresses relocation assistance for unpermitted rental units and requires that eviction notices must list one of the permitted RSO eviction reasons.

*(n) Development Guidelines and Controls for Central Industrial Redevelopment Project Area*

The Central Industrial Redevelopment Project Area has development guidelines and controls for residential hotel preservation. The Development Guidelines protect and preserve existing affordable housing by mitigating the hardship caused by displacement of low-income households. These Development Guidelines guarantee a one for one replacement of residential hotel units when a residential hotel is proposed for conversion or demolition within the Central Industrial Project Areas.

## b) Existing Conditions

### (1) On-Site Conditions

The Project Site is occupied by cold storage facilities that include warehouse and associated office space, truck loading docks, and surface parking. The existing buildings on the Project Site total approximately 360,734 square feet of floor area. There are a total of 69 employees on the Project under existing conditions.<sup>21</sup> No residential uses or associated existing population reside on the Project Site under existing conditions.

### (2) Population, Housing, and Employment Estimates

Current and future projected population, housing, and employment estimates for the City are based on data included in the 2020–2045 RTP/SCS, which is described in greater detail below.

The 2020–2045 RTP/SCS prepares growth projections for populations, households, and employment for regional, county, and local jurisdictional areas (including the City).<sup>22</sup> The 2020–2045 RTP/SCS reports the demographic data for years 2016 and 2045. The 2020–2045 RTP/SCS forecasts represent the likely growth scenario for the Southern California region in the future, taking into account recent and past trends, reasonable key technical assumptions, and local or regional growth policies.<sup>23</sup>

The 2022 Project baseline population and growth projections for 2030 (earliest Project buildout year) and 2045 (SCAG 2020–2045 RTP/SCS Projection Horizon) are shown in **Table IV.H-1, Projected Population, Housing and Employment Estimates for the City of Los Angeles**, and discussed below.<sup>24</sup>

<sup>21</sup> Number of existing employees provided by existing site operator via e-mail correspondence on March 7, 2022.

<sup>22</sup> SCAG, *Connect SoCal: 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy*, Demographics & Growth Forecast Appendix, September 3, 2020.

<sup>23</sup> SCAG, *Connect SoCal: 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy*, Demographics & Growth Forecast Appendix, September 3, 2020.

<sup>24</sup> The 2022 baseline estimates were determined by interpolating from data presented in the SCAG projections based on values provided for 2016 and 2045. The 2022 estimate is calculated by:  $(((2045 \text{ data} - 2016 \text{ data}) / 29 \text{ years}) * 6 \text{ years}) + 2016 \text{ data} = 2022 \text{ baseline estimate}$ . The 2030 estimate is calculated by:  $(((2045 \text{ data} - 2016 \text{ data}) / 29 \text{ years}) * 14 \text{ years}) + 2016 \text{ data} = 2030 \text{ (earliest Project buildout estimate)}$ . The 2045 estimates are provided by SCAG and did not require extrapolation.

**TABLE IV.H-1  
PROJECTED POPULATION, HOUSING, AND EMPLOYMENT ESTIMATES FOR THE CITY OF  
LOS ANGELES**

	2030 (Earliest Project Buildout Year)				2045 (SCAG 2020–2045 RTP/SCS Projection Horizon)		
	Project 2022 Baseline	Projected	Total Growth	Percentage Increase as Compared to 2022	Projected	Total Growth	Percentage Increase as Compared to 2022
Population	4,107,076	4,338,110	231,034	5.6%	4,771,300	664,224	16.2%
Housing	1,455,138	1,572,655	117,517	8.1%	1,793,000	337,862	23.2%
Employment	1,907,804	1,987,141	79,337	4.2%	2,135,900	228,096	12.0%

SOURCE: ESA, 2022. Based on SCAG data prepared for the 2020–2045 RTP/SCS. 2022 and 2030 projected and total growth numbers are interpolated from 2016 and 2045 data in the 2020–2045 RTP/SCS.

*(a) Population*

As indicated in Table IV.H-1, the City’s population is expected to grow by 231,034 people or 5.6 percent by the time of Project buildout in 2030 (earliest Project Buildout year). By 2045, the horizon year of the SCAG 2020–2045 RTP/SCS, the population is expected to increase in the City by 664,224 people or 16.2 percent.

*(b) Housing*

As indicated in Table IV.H-1, the number of households/occupied housing units is expected to increase in the City by 117,517 units or 8.1 percent by the time of Project buildout in 2030 (earliest Project buildout year). By 2045 (the horizon year of the SCAG 2020–2045 RTP/SCS), the number of households in the City is expected to grow by 337,862 units or 23.2 percent.

*(c) Employment*

As shown in Table IV.H-2, the number of employees in the City is expected to grow by 79,337 employees or 4.2 percent by the time of Project buildout in 2030 (earliest Project buildout year). By 2045 (the horizon year of the SCAG 2020–2045 RTP/SCS), the number of workers in the City is expected to grow by 228,096 workers or 12.0 percent.

### 3. Project Impacts

#### a) Thresholds of Significance

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

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

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

For this analysis, the Appendix G Thresholds 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 factors to evaluate population and housing impacts include:

- 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 analysis of population and housing impacts evaluates whether the Project's contribution to population, housing, and/or employment growth are consistent with the future growth projections and related policies outlined above in order to assess the potential for impacts on the physical environment.

The 2020–2045 RTP/SCS is the most recently adopted plan that provides population, housing, and employment projections for the City for the period between 2016 and 2045. Therefore, for purposes of this analysis, population, housing, and employment projections from the 2020–2045 RTP/SCS for the City are used to assess the extent to which Project growth falls within forecasted growth in order to assess the potential for physical impacts on the environment. Projections for Project Baseline Year 2022 and Earliest Project Buildout Year of 2030 are interpolated from the reported demographic data (see calculations in Appendix H of this Draft EIR). The SCAG horizon year 2045, is not interpolated as direct projections from the SCAG 2020–2045 RTP/SCS are provided. The 2020–2045 RTP/SCS forecasts represent the likely growth scenario for the Southern



California region in the future, taking into account recent and past trends, reasonable key technical assumptions, and local or regional growth policies.<sup>25</sup>

The Project's residential population was calculated based on the Population Per Unit Factor for multi-family units within the City of Los Angeles VMT Calculator Documentation, which assumes an average household size of 2.25 population.<sup>26</sup> Note that as the Project proposes a mix of 1,156 dwelling units with three or less habitable rooms, 365 dwelling units with greater than three habitable rooms, the citywide number of 2.25 used in the analysis below provides for a conservative estimate that likely overstates the Project's actual population. The Project's projected number of employees was also taken from the City's VMT Calculator, which is included in the Project's TA.<sup>27</sup> The Project's contributions to population, housing, and employment are then compared to projections from SCAG for the City, to determine whether growth associated with the Project would result in impacts on the environment due to unplanned growth or conflicts with applicable City and regional goals, objectives and policies.

### c) Project Design Features

No specific Project Design Features are proposed with regard to population, housing, and employment.

### d) Project Impacts

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

#### (1) Impact Analysis

##### (a) Construction Impacts

The construction of the Project would result in increased employment opportunities in the construction field, which could potentially result in increased permanent population and demand for housing in the vicinity of the Project Site. However, the employment patterns of construction workers in Southern California are such that it is not likely that they would relocate their households as a consequence of the construction employment associated

<sup>25</sup> SCAG, *Connect SoCal: 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy*, September 3, 2020.

<sup>26</sup> Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.

<sup>27</sup> Gibson Transportation Consulting, Transportation Assessment (TA) for the Fourth & Central Project, Los Angeles, California, June 2022. See Appendix J of this Draft EIR.

with the Project. The construction industry differs from most other industry sectors in several ways:

- There is no regular place of work. Construction workers regularly commute to job sites that change many times over the course of a year. Their sometimes-lengthy daily commutes are facilitated by the off-peak starting and ending times of the typical construction workday;
- Many construction workers are highly specialized (e.g., crane operators, steelworkers, masons, etc.) and move from job site to job site as dictated by the demand for their skills; and
- The work requirements of most construction projects are highly specialized. Workers remain at a job site only for the time frame in which their specific skills are needed to complete a particular phase of the construction process.

Therefore, Project-related construction workers would not be likely to relocate their place of residence as a consequence of working on the Project. Although construction of the Project would generate direct (in the form of short-term construction jobs at the Project Site), indirect (in the form of employment supported by Project construction-related expenditures), and induced (in the form of wages paid to construction workers) employment impacts, Project-related construction would not generate permanent new employment that would significantly contribute to local or regional growth. Furthermore, there would be no significant housing or population impacts associated with the construction phase of the Project. **Therefore, Project construction would not induce substantial unplanned population growth indirectly in the Project area, and impacts would be less than significant.**

(b) *Operational Impacts*

(i) *Project Population, Housing, and Employment Generation*

With Project implementation, the Project Site would be developed with approximately 1,521 multi-family residential dwelling units, 411,113 square feet of office, 113,565 square feet of retail/restaurant, and 68 hotel rooms (74,484 square feet). The existing cold storage facilities and associated improvements would be demolished for development of the Project. The Project's projected increases in residential population and housing stock are summarized **Table IV.H-2, *Estimate of Project Population and Housing***.

The Project's projected increase in employment is summarized in **Table IV.H-3, *Estimate of Project Employment***. As shown therein, the Project is estimated to generate 2,044 employees. Accounting for the 69 employees in the existing uses, the net total increase in employment is 1,975 employees.

**TABLE IV.H-2  
ESTIMATE OF PROJECT POPULATION AND HOUSING**

<b>Total Housing Units</b>	<b>Average Household Size<sup>a</sup></b>	<b>Total Population</b>
1,521	2.25	3,423

NOTE(S):

<sup>a</sup> Based on the Population Per Unit Factor for multi-family units within the City of Los Angeles VMT Calculator Documentation, which assumes an average household size of 2.25 population.

SOURCE: ESA, 2022.

**TABLE IV.H-3  
ESTIMATE OF PROJECT EMPLOYMENT**

<b>Use</b>	<b>Number of Employees</b>
Project Employees	2,044 <sup>a</sup>
Existing Uses	69 <sup>b</sup>
<b>Net New Employees</b>	<b>1,975</b>

NOTE(S):

sf = square feet; rm = room; emp = employee; ksf = 1,000 square feet

<sup>a</sup> Employment for Project uses taken from VMT Calculator worksheets in Appendix F of the TA. The TA is provided in Appendix J of this Draft EIR. Also, a breakdown of employees by land use is provided in Table IV.L.3 3, Estimated Operational Solid Waste Generation, in Section IV.L-3, Utilities and Service Systems – Solid Waste, of this Draft EIR.

<sup>b</sup> Existing employees provided by current site operator.

SOURCE: ESA, 2022.

### (a) Population

SCAG's 2020–2045 RTP/SCS provides short-term and long-term population estimates for the City. As shown in Table IV.H-1 above, the population in the City was estimated to be 4,107,076 in 2022 and is projected to be 4,338,110 in 2030, the Project's earliest projected buildout year. The Project's contributions to growth projections in the SCAG 2020–2045 RTP/SCS for the City are shown in in **Table IV.H-4, Project Population, Housing, and Employment Percentages for the City of Los Angeles**.

**TABLE IV.H-4**  
**PROJECT POPULATION, HOUSING, AND EMPLOYMENT PERCENTAGES FOR THE CITY OF**  
**LOS ANGELES**

	Project Increase <sup>a</sup>	SCAG Projected Growth <sup>b</sup>	Project Percentage of Growth <sup>c</sup>
<b>Population</b>			
2022–2030 Earliest Buildout	3,423	231,034	1.5%
2022–2045 Projection Horizon	3,423	664,224	0.5%
<b>Households</b>			
2022–2030 Earliest Buildout	1,521	117,517	1.3%
2022–2045 Projection Horizon	1,521	337,862	0.5%
<b>Employment</b>			
2022–2030 Earliest Buildout	<b>1,975</b>	79,337	2.5%
2022–2045 Projection Horizon	1,975	228,096	0.9%

## NOTE(S):

<sup>a</sup> From Table IV.H-2 for population and housing, and Table IV.H-3 for employment.

<sup>b</sup> From Table IV.H-1.

<sup>c</sup> Percentages are rounded to the nearest tenth.

SOURCE: ESA, 2022.

As shown in Table IV.H-4, the Project's 3,423 residents with potential buildout in 2030 (Earliest Project Buildout year) would comprise approximately 1.5 percent of SCAG's estimated population growth by 2030. SCAG's longer-term projected population increase for the City in 2045 shows an additional 664,224 residents for a total residential population of 4,338,110; therefore, the Project would comprise approximately 0.5 percent of SCAG's total population increase for the City between 2022 and 2045.

On a regional level, the Project Site is located within a Transit Priority Area (TPA) and a SCAG-designated HQTAs, as it is located within approximately 0.4 miles of the planned and under construction Metro L Line Little Tokyo/Arts District Station at 1st Street and Central Avenue, which is located to the north of the Project Site.<sup>28,29</sup> The Project's development would support the attainment of the SCAG policies discussed in Subsection 2.a.2.a, *Southern California Association of Governments*, by increasing population density through infill development within an area targeted to provide high-density

<sup>28</sup> Gibson Transportation Consulting Inc., Transportation Assessment for the Fourth & Central Project, June 2022. Provided in Appendix J of this Draft EIR.

<sup>29</sup> SCAG, *Connect SoCal: 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy*, September 3, 2020, Exhibit 3.8.

development along transit corridors.<sup>30</sup> The Project's mixed-use components and contributions to walkable communities would also contribute to the attainment of SCAG policies. The Project would provide a mixed-use development in proximity to public transit, which would help reduce vehicle trips and per capita VMT. Further analysis of whether the Project conflicts with the goals of the 2020–2045 RTP/SCS is discussed in greater detail in Section IV.F, *Land Use and Planning*, of the Draft EIR.

At the local level, the Project would be in compliance with the objectives and policies found within the City's General Plan, Community Plan, and L.A.'s Green New Deal (Sustainable City pLAN 2019). The Project would develop complementary residential uses within a TPA that is in proximity to transit, ensuring that new residential units would be accessible to high-quality transit, in support of the objectives and policies found within these plans. Further analysis of whether the Project conflicts with the goals, objectives, and policies of the City's General Plan and Community Plan is discussed in greater detail in Section IV.F, *Land Use and Planning*, of this Draft EIR and analysis of whether the Project conflicts with the goals and actions L.A.'s Green New Deal (Sustainable City pLAN 2019) is provided in Section IV.E, *Greenhouse Gas Emissions*, of this Draft EIR.

The Project's contribution to population growth continues an infill growth pattern that is encouraged locally in the City's plans and regionally by SCAG policies and is well within the projected growth forecasts for the City and region. Thus, the Project is consistent with regional and local policies. The Project's contribution to population growth would fall within and be consistent with SCAG population projections for the City. **As such, impacts related to induced substantial unplanned population growth under the Project during long-term operation of the Project would be less than significant.**

#### (b) Housing

As shown in Table IV.H-4, the Project's proposed 1,521 housing units would comprise 1.3 percent of SCAG's year 2030 estimated increase of 117,517 households within the City. The Project would comprise 0.5 percent of SCAG's 2045 estimated increase of 337,862 households within the City. The Project would result in population growth directly through the introduction of 1,521 housing units on the Project Site which currently has no residential uses. This growth would contribute towards the attainment of City and regional goals and policies to encourage housing development in the greater Los Angeles area. The City's Housing Element's states, "It is the overall housing vision of the City of Los Angeles to create housing opportunities that enhance affordability, equity, livability and sustainability by remedying discriminatory housing practices and creating a city with a range of housing types, sizes, and costs in close proximity to jobs, transit, amenities, and services."<sup>31</sup> Of note, Policy 3.2.2 of the Housing Element states that the City should "Promote new multi-family housing, particularly Affordable and mixed-income housing, in

<sup>30</sup> SCAG, *Connect SoCal: 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy*, September 3, 2020.

<sup>31</sup> City of Los Angeles Department of City Planning, *Housing Element 2013–2021-2029*, Chapter 6, page 244.

areas near transit, jobs and Higher Opportunity Areas, in order to facilitate a better jobs-housing balance, help shorten commutes, and reduce greenhouse gas emissions.”<sup>32</sup> As previously indicated, the Project Site is located within a TPA and a SCAG-designated HQT. The Project Site’s accessibility to transit would help the City increase housing with these transit priority areas, and would contribute to the City’s ability to meet its housing obligation under SCAG’s RHNA and goals of the Housing Element. **Therefore, impacts related to induced substantial unplanned population growth through the Project’s contribution to housing during long-term operation would be less than significant.**

### (c) Employment

As shown in Table IV.H-3, the Project would generate a net total of 1,975 employees, which would comprise 2.5 percent of SCAG’s year 2030 estimated growth of 79,337 employees within the City. The Project would comprise 0.9 percent of SCAG’s 2045 estimated growth of 228,096 employees within the City.

Improving the jobs/housing balance is one tool for reducing impacts on the environment by reducing VMT. The ratio of jobs to housing is one indicator of proximity between employment and residential locations for population in the region. The jobs/housing ratio for the entire SCAG region is approximately 1.35.<sup>33</sup> That is, there are approximately 1.35 jobs for each household unit. Large variations from this ratio in local communities indicate whether the communities are housing-rich (i.e., bedroom communities) or employment-rich. Such communities require longer commuting distances between home and work. Communities whose ratios are closer to 1.35 have more of a balance between residents and employees within their boundaries.

Based on the 2022 employment and household estimates presented in Table IV.H-1, above, the 2022 jobs/housing ratio in the City is 1.31.<sup>34</sup> The projected 2030 estimate for the City would be decreased slightly to 1.26.<sup>35</sup> The projected 2045 estimate is 1.19.<sup>36</sup> Inclusion of the Project to the City’s employment and household numbers would maintain the jobs/housing ratio of 1.31, 1.26, and 1.19 for 2022, 2030, and 2045, respectively. While the City’s jobs/housing ratio is close to the regional average, the distribution of employment within the City is not proportioned evenly, which skews the overall City’s jobs/housing ratio. In particular, areas of the City, such as the Downtown area, are

<sup>32</sup> City of Los Angeles Department of City Planning, Housing Element 2013–2021-2029, Chapter 6, page 252.

<sup>33</sup> SCAG, *Connect SoCal: 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy*, Demographics & Growth Forecast Appendix. Based on 2016 employment of 8,389,000 and 6,012,000 households as presented in Table 13, County Forecast of Population, Households, and Employment, page 29.

<sup>34</sup> The 2022 jobs/housing ratio is calculated by (2022 employment value / 2022 household value), which is 1,907,804 / 1,445,138, resulting in 1.31.

<sup>35</sup> The 2030 jobs/housing ratio is calculated by (2030 employment value / 2030 household value), which is 1,987,141 / 1,572,655, resulting in 1.26.

<sup>36</sup> The 2045 jobs/housing ratio is calculated by (2045 employment value / 2045 household value), which is 2,135,900 / 1,793,000, resulting in 1.19.

disproportionately employment oriented as compared to other areas. City and regional policies have encouraged the placement of a proportionate increase in the number of housing units as compared to jobs so as to bring the City's ratio closer to the regional balanced ratio of 1.35. Chapter 7 of the Framework Element emphasizes that the jobs/housing ratio must be maintained because if it declines, the City's economic vitality would spiral downward, but if the ratio increased, the housing shortage and the need for affordable housing would be exacerbated.<sup>37</sup> By co-locating jobs and housing on a site that does not currently have any existing housing, the Project would support the City's efforts to improve the jobs/housing balance in the City.

Additionally, the Project would comply with the Community Plan's objectives to promote land uses in Central City that will address the needs for all visitors and to encourage a mix of uses which create an active 24-hour downtown environment. The Project's office, retail/restaurant, and hotel uses would expand the market opportunities for both the existing and new businesses within the Community Plan area. Additionally, the Project's pedestrian connections and landscaped open space would enhance existing pedestrian street activity. Thus, the Project is consistent with regional and local policies.

**Therefore, impacts related to induced substantial unplanned population growth through the Project's contribution to employment during long-term operation would be less than significant.**

*(ii) Infrastructure*

The Project proposes infill development in an urban area with an established infrastructure system. The Project would increase population, housing, and employment, which would increase demand on infrastructure to serve the Project Site and the surrounding area. The Project would link with and tie into existing infrastructure in the Project area. Where infrastructure improvements to serve the Project are required, such as service connections to local water and sewer network and electricity and natural gas utilities, they would be sized to serve the Project while accounting for other demands in the area that would use the same infrastructure. As further discussed in Section IV.L.1, *Utilities and Service Systems - Water Supply*, and IV.L.2, *Utilities and Service Systems - Wastewater*, of this Draft EIR, analyses have been conducted with input from the City that demonstrate that upon Project buildout, there would be adequate infrastructure to serve the Project.

Project operation would modify access points into and through the Project Site. However, the Project would not include roadways into an area that would result in substantial new population growth.

Based on the above, given the infill nature of the Project, and its location on a Project Site that is well served by existing infrastructure, the Project would not induce substantial

<sup>37</sup> City of Los Angeles, *The Citywide General Plan Framework, An Element of the City of Los Angeles General Plan*, Chapter 7 Economic Development, August 8, 2001, page 7-5.

population growth indirectly through the extension of roads or other infrastructure. **Therefore, infrastructure improvements under the Project would not induce substantial unplanned population growth in an area, either directly or indirectly, and impacts would be less than significant.**

(iii) *Conclusion*

**Based on the above, the Project would not 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). Therefore, the Project would result in less than significant impacts due to induced substantial unplanned population growth.**

(2) Mitigation Measures

Impacts related to unplanned population, housing, and employment growth would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts related to unplanned population, housing and employment growth 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.

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

As discussed in the Initial Study (Appendix A of this Draft EIR), no dwelling units are currently located on the Project Site. **Because no people or housing would be displaced, the Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere because there are no residential uses currently on the Project Site, and, therefore, no impact would occur with respect to Threshold (b). No further analysis is required.**

**e) Cumulative Impacts**

(1) Impact Analysis

Cumulative impact analysis addresses the impacts of known and anticipated development in the Project area in combination with the proposed Project, with respect to the anticipated amount, timing, and distribution of population, housing, and employment growth. The 39 related projects are listed in Table III-1 of Chapter III, *Environmental Setting*, of this Draft EIR.



*(a) Construction*

The construction of the Project, in addition to the 39 related projects, are anticipated to generate a number of skilled construction-related jobs during the construction phases. The work requirements of many construction projects are highly specialized so that construction workers remain at a job site only for the time frame in which their specific skills are needed to complete a particular phase of the construction process. As a result, construction workers typically work at several job sites within the region throughout the year and rotate from job site to job site. Therefore, most construction workers would not be expected to relocate their place of residence as a consequence of working on the Proposed Project and related projects. As such, a substantial number of new permanent residents would not be generated as a result of the construction of the Project and related projects, and cumulative impacts associated with population growth due to temporary construction jobs would be less than significant.

*(b) Operation*

The calculation of the cumulative number of housing units, population, and employees attributable to the related projects is provided in Appendix H, Population, Housing and Employment Data, of this Draft EIR. A summary of cumulative growth is shown in **Table IV.H-5, Total Cumulative Development**. Projections focus on the SCAG 2020–2045 RTP/SCS 2045 horizon as opposed to the Project’s 2030 earliest Project buildout year. The 2045 horizon is considered the appropriate timeframe for evaluating cumulative impacts as SCAG projections incorporate regional policies and are based on long-term demographic trends that average out short-term variations, which may not be reflected in 2030 (earliest Project buildout year) projections.<sup>38</sup>

**TABLE IV.H-5  
TOTAL CUMULATIVE DEVELOPMENT**

Development <sup>a</sup>	Population <sup>b</sup>	Housing Units <sup>b</sup>	Employment <sup>b</sup>
Related Projects	17,245	7,660	12,491
Proposed Project - Total Buildout	3,423	1,521	1,975
<b>Total Cumulative Growth</b>	<b>20,668</b>	<b>9,181</b>	<b>14,466</b>

NOTE(S):

<sup>a</sup> A list of the related projects is provided in Table III-1 of Chapter III, *Environmental Setting*, of this Draft EIR.

<sup>b</sup> The calculations for housing, population, and employment are presented in Appendix H of this Draft EIR.

SOURCE: ESA, 2023.

<sup>38</sup> SCAG, *Connect SoCal: 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy*, September 3, 2020, page 19.

Similar to the Project, a majority of the related projects are infill development in an already urbanized area, near existing employers, housing, and retail destinations, and are also consistent with the 2020-2045 RTP/SCS' focus on integrated land use planning. Additionally, a many of the related projects are located in SCAG-designated HQTAs. The 2020-2045 RTP/SCS forecasts that these areas, while comprising under three percent of land area in the region, will make over 51 percent of future household growth<sup>39</sup> and nearly 60 percent of future job growth.<sup>40</sup> The Project and the cumulative projects are consistent with these anticipated growth patterns. With the related projects being infill projects with developed infrastructure, like the Project, would not lead to unplanned growth through need for new roads, infrastructure, etc.

**Table IV.H-6, *Cumulative Population, Housing, and Employment***, compares projected cumulative growth, inclusive of the Project, to the 2020–2045 RTP/SCS's 2045 horizon year. The related projects reflect a mix of development including residential, office, hotel, and commercial uses.

**TABLE IV.H-6  
CUMULATIVE POPULATION, HOUSING AND EMPLOYMENT**

	Cumulative Increase Including Proposed Project <sup>a</sup>	SCAG Projected Growth <sup>b</sup>	Cumulative Percentage of Growth <sup>c</sup>
Population	20,668	664,224	3.1%
Households	9,181	337,862	2.7%
Employment	14,466	228,096	6.4%

NOTE(S):

<sup>a</sup> From Table IV.H-5.

<sup>b</sup> From Table IV.H-1.

<sup>c</sup> Percentages are rounded to the nearest tenth.

SOURCE: ESA, 2023.

*(i) Population*

As indicated in Table IV.H-6, the Project and related projects' cumulative population growth of 20,668 is equal to 3.1 percent of the population growth estimated in the SCAG projection for the City by the 2045 horizon year.

<sup>39</sup> SCAG, *Connect SoCal: 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy*, September 3, 2020, page 51.

<sup>40</sup> SCAG, *Connect SoCal: 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy*, September 3, 2020, page 128.

*(ii) Housing*

The Project and related projects would result in the construction of approximately 9,181 dwelling units within the City, which is 2.7 percent of Citywide projected housing growth by the year 2045.

*(iii) Employment*

The approximately 14,466 employment opportunities associated with the Project and related projects would represent 6.4 percent of the projected new jobs Citywide by 2045.

*(iv) Conclusion*

As noted above, the projected population, household, and employment growth would be within the 2045 SCAG projections identified in the 2020–2045 RTP/SCS for the City. The increases in population (3.1 percent) and households (2.7 percent) show that the City is attracting relatively similar proportionate amounts of residential and housing growth in the area. Additionally, the total amount of development reflects the proportion of growth occurring in the City as a whole. The increase in housing stock in the City provides opportunities for residents to locate within an HQTAs and within proximity to transit facilities, thereby reducing the demand for development in lower-density areas and achieving greater efficiency in the provision and use of services and infrastructure. Furthermore, the Project and related projects would contribute to infill growth patterns, including concentrated growth within TPAs, as encouraged in City plans and SCAG's regional plans, as discussed further in Section IV.E, *Greenhouse Gas Emissions*, and Section IV.F, *Land Use and Planning*, of this Draft EIR.

The additional employment opportunities would increase the number of jobs adjacent to residential areas and public transit, which would support City and regional policies intended to reduce VMT. The new jobs would bolster the local economy and bring new jobs to an area that is prime for employment growth. The related projects alone for the City would have a jobs/housing ratio of 1.63 (12,491 jobs:7,660 housing units), which indicates the large number of jobs that would be introduced to the City from the related projects. These growth trends indicate that the City's new developments are bringing more employment opportunities while improving its distribution of jobs and housing. The increase in employment also furthers the City's efforts to improve the jobs/housing balance in the City, as described above.

In summary, growth associated with the Project and related projects would fall within regional forecasts and would contribute to infill growth patterns, including concentrated growth within TPAs, as encouraged locally in City plans and in SCAG's regional plans. Accordingly, cumulative impacts associated with population, housing and employment growth would be less than significant. Furthermore, the Project would not displace people or housing and therefore there would be no associated cumulative impact.

**For these reasons, cumulative impacts on population, housing, and employment would be less than significant.**

(2) Mitigation Measures

Cumulative impacts regarding induced substantial unplanned population growth would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Cumulative impacts regarding induced substantial unplanned population growth 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.