
APPENDIX B

Methodology

APPENDIX B. METHODOLOGY

POPULATION, HOUSING AND EMPLOYMENT

This section describes the data sources and methodologies employed in the identification of the Draft EIR Existing Conditions and Future Projections, both of which are used to assess potential impacts of the Proposed Cornfield Arroyo Seco Specific Plan (Proposed Plan). This section also explains how reasonably expected population, housing, and employment under the Proposed Plan are derived and how the Proposed Plan addresses anticipated growth.¹

The Draft EIR evaluates the potential environmental impacts related to anticipated changes in population, housing and employment based upon information from a variety of sources including, the United States Census Bureau (U.S. Census), California Department of Finance (DOF), California Employment Development Department (EDD), the Southern California Association of Governments (SCAG), the City of Los Angeles Department of City Planning (DCP), the City of Los Angeles General Plan Framework Element (Framework) and associated documents. Since each of these sources may use different methods of data collection and analysis and/or different timeframes, the data do not always arrive at precisely the same results. Accordingly, the demographic data used in the analysis may vary somewhat, depending upon the source cited. Despite the variations, the data used in this Draft EIR represent the best available data sources during the Draft EIR preparation and provide a reasonable estimate of the population, housing, and employment characteristics of the Cornfield Arroyo Seco Specific Plan Area (Specific Plan Area).

EXISTING CONDITIONS

Existing Conditions or Baseline Conditions for the purposes of environmental analysis of a specific plan update, can be described in demographic terms (population, housing, and employment) or in terms of development characteristics (square feet of development, height of structures or number of housing units). The City has the discretion to determine the best data source for Existing Conditions. For Existing Conditions, DCP, as the City's professional planning agency and the department responsible for reviewing and preparing the Draft EIR, uses demographic data that is published and referenced public data used by multiple agencies in planning for the City and region. Obtaining accurate development characteristics at the parcel level for a Specific Plan Area has in recent decades become possible through geographic information systems (GIS); however the technology still presents practical difficulties in verifying precise, detailed data at the lot and parcel level for a city the size of Los Angeles. The size of the City at over 478 square miles (including 5 square miles of water area) results in duplicate, incomplete, and/or unverified data that is time and cost prohibitive to verify at present. Reasonable efforts are made to collect and use the most complete and current data at the time of the Draft EIR analysis recognizing the constraints, limitations and margins of error associated with data sources.

¹ Nothing in this document is intended to contradict or control the particular data or methodology used in the EIR. This methodology was developed by DCP in its review and preparation of Draft EIRs for the community plan and specific plan update programs and is provided in the appendices to supplement and support the Draft EIR.

The leading source of demographic data is the U.S. Census. While Census data is typically the most reliable representation of socioeconomic data, such as housing and population, for discrete geographic areas, it is only available on a decennial basis, i.e., 2000, 2010, and 2020. While it is preferable to utilize decennial census data for analysis, it is not always possible to align planning processes with the release of decennial census data. Consequently, other sources are consulted to employ the most current information as well as to provide a benchmark for the Existing Condition year. In the interim years, the U.S. Census Bureau gathers more detailed socioeconomic data through other surveys, such as the American Community Survey (ACS) program, which provides data on an annual basis for certain geographies. For example, the ACS provides annual estimates for incorporated cities but does not provide annual estimates for specific plan areas. There is a lag time between when the data is collected and when it is released for both Census products. Both the decennial Census and ACS data are subject to sampling variability.

SCAG, as the Regional Transportation Planning Agency (RTPA) and the Metropolitan Planning Organization (MPO), publishes demographic estimates and projections through the long-range Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which is updated by SCAG every four years. Census and ACS data are utilized by SCAG to prepare regional demographic estimates and forecasts. In addition to estimating existing demographics, the RTP/SCS provides a vision for future transportation investments throughout the region. Using demographic growth forecasts and economic trends that project out over a 20-year period or "horizon," typically, the RTP/SCS considers the role of transportation in regional planning in the broader context of economic, environmental, and quality-of-life goals for the region. Therefore, SCAG data are often utilized by planning agencies in the region for consistency with the goals and demographic data of the RTP/SCS.

■ **Baseline Existing Conditions (SCAG)**

SCAG is the regional demographer for a six-county region that includes Los Angeles County. In that capacity it has an established methodology for estimating population, housing, and employment for the region and for projecting future population, housing, and employment at a jurisdictional or citywide level. SCAG utilizes various sources to determine existing or baseline population, housing and employment. This method is used for deriving annual estimates of population, housing, and employment for years that are not a Census year.

SCAG's small area growth forecasting process is applied to develop baseline year estimates and future year socioeconomic data at the Transportation Analysis Zone (TAZ) level. The approach is utilized by SCAG to distribute jurisdictional level population, housing, and employment estimates and projections into TAZs. Population figures are estimates derived from households and are generally viewed to be a more accurate representation at a jurisdictional level where multiple data sources are consulted. It is generally less precise to estimate population numbers for smaller areas, and or for areas where boundaries do not precisely match census reporting divisions, such as at the Specific Plan Area level than at recognized jurisdictional boundary levels.

The following is the list of SCAG data sources excerpted from the most recent 2020 RTP/SCS Background Document Report:

- California Department of Finance (DOF) population and household estimates;

- California Employment Development Department (EDD) jobs report by industry;
- 2015 existing land use and General Plans from local jurisdictions;
- 2010 Census and the latest ACS data (2013-2017 5-year samples);
- County assessor parcel databases;
- 2011 and 2015 business establishment data from InfoGroup; and
- SCAG's 2016 RTP/SCS growth forecast.

See the following SCAG publication for the full methodology employed to determine estimates and forecasts of population, housing, and employment data:

https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf

■ How DCP Verifies Existing Conditions

DCP has regularly tracked growth and development activity in the City. As part of the regional planning process, local planning departments (including DCP) work together with SCAG to develop demographic estimates for the City of Los Angeles and the Southern California region approximately every four years. SCAG publishes regional transportation and sustainability plans (RTP/SCSs) every four years. However, the cycles of RTP preparation do not regularly coincide with the release of Census data. Because of the time involved in preparing the RTP/SCS, there is a lag between the time the Census data is released or demographic estimate is prepared and the time that SCAG makes demographic estimates available through the RTP/SCS. An additional lag occurs between the time the Planning Department receives SCAG's demographics estimates for the baseline and forecasts for the horizon year, and the time a draft specific plan and EIR are completed. Therefore, interpolations of data utilizing a previous point in time and future point may be necessary.

Furthermore, the DCP's planning process for community and specific plan updates is comprehensive; the updates are long-term projects that take several years to complete. The planning process focuses on addressing land use changes at the parcel level to both resolve inconsistencies in land use regulations as well as to fulfill City objectives. For the Proposed Plan, the Notice of Preparation (NOP) was released in April 8, 2021, and the latest available Decennial Census data was for the year 2010.² The 2010 Census data provides a snapshot in time and is used as a reference to benchmark data along with other sources. Given the number of years that have lapsed between the release of the 2010 Census and the present, the Census data no longer reflects the best available data for 2021, the NOP publication year. Growth has occurred in the years after the Great Recession and consequently, more recent data from the 2016-2040 RTP/SCS is utilized for Existing Conditions.³

² The Census Bureau released the initial 2020 Census Post-Enumeration Survey (PES) results, which provides estimates of population coverage overall and for important demographic groups, on March 10, 2022, after the NOP release.

³ As the 2016 RTP/SCS utilizes a baseline year of 2012, 2021 baseline year demographic estimates were interpolated (an annual average growth rate was applied) to estimate existing conditions. The interpolation method was corroborated by SCAG as a suitable methodology to estimate existing conditions.

SCAG’s two most recent RTP/SCSs, the 2016-2040 RTP/SCS and 2020-2045 RTP/SCS, were adopted in April 2016 and September 2020, respectively. As described in further detail below, the population, housing, and employment projections of these two regional plans are consistent with each other in the Specific Plan Area. Accordingly, the City has elected to use the socio-economic estimates and projections of the 2016-2040 RTP/SCS in this EIR in order to be consistent with the City of Los Angeles Travel Demand Forecasting (TDF) Model. The current TDF Model, which was developed in the last few years as part of the City’s effort to move to vehicle miles traveled (VMT) thresholds of significance, relies on the 2016-2040 RTP/SCS. The outputs of the TDF Model are used to inform transportation, air quality, and greenhouse gas emissions analysis in this EIR.

The City has begun the process of updating the TDF Model to use 2020-2045 RTP/SCS data. However, the update is not expected to be complete by the time this EIR is published. It would not be reasonable to complete an update to the TDF Model every time the City prepares a new EIR, as the update is a significant, multi-year work product costing approximately \$400,000. The current TDF Model is the best tool the City has available to estimate VMT and conduct the required analysis. As such, the socio-economic data for the Proposed Plan is derived from 2016-2040 RTP/SCS population, housing, and employment estimates, which as shown below in Table 1, is consistent with the data from the most recent 2020-2045 RTP/SCS.

TABLE 1 BASELINE YEAR (2021) SOCIO-ECONOMIC DATA ESTIMATES WITHIN THE PROJECT AREA		
	2016-2040 RTP/SCS (2021)	2020-2045 RTP/SCS (2021)
Population	6,027	6,202
Households	2,012	1,936
Employment	5,411	6,189
Source: SCAG 2016-2040 RTP/SCS and 2020-2045 RTP/SCS interpolated.		

Between the 2016-2040 RTP/SCS and 2020-2045 RTP/SCS, the population and households estimates for the baseline year (2021) differ by less than 3 percent and 4 percent, respectively. The 2016-2040 RTP/SCS estimates that baseline year employment within the Project Area is 5,411 jobs, compared to the 2020-2045 RTP/SCS’s estimate of 6,189 jobs, a difference of 14 percent. The use of the 2016-2040 RTP/SCS’s lower employment figure represents a more conservative analysis, as the EIR would be analyzing a greater employment delta over the course of the Proposed Plan compared to the 2020-2045 RTP/SCS’s higher baseline year employment figure.

Many municipalities and government agencies (including public service providers and other City departments) rely on the same source, i.e., 2016-2040 SCAG RTP/SCS data, for purposes of planning, both for estimates of current population, housing and employment, as well as for projections of future population, housing, and employment. Use of such data is a consistent and best practice for local governments. It is also the DCP’s practice to use SCAG RTP/SCS data as a benchmark or as a reference point for estimates and projections locally.

Although CEQA does not require a lead agency to change the baseline year for Draft EIR analysis every

time a government agency at the state, federal, or local level issues a projection for a future condition or issues an estimate for those years subsequent to the Draft EIR baseline year, the DCP does review new data or projections released subsequent to the publication of the NOP to verify that it would not substantively affect the analysis or conclusions for significant impacts that are correlated or reliant upon population, housing or employment data. For instance, the City used Los Angeles County Assessor data to benchmark and analyze the general distribution patterns and totals for housing estimates in the Specific Plan Area. This system of utilizing SCAG data and comparing or benchmarking it with other available data represents a best practice approach to obtaining and using complete and most current data. Other sources were also consulted (i.e., Longitudinal Employer-Household Dynamics (LEHD) and American Community Survey) to verify demographic totals for the Specific Plan Area. See Table 2. These sources are used as benchmarks or control totals whereas Assessor data is used for distribution because it is regularly updated and available at small geographic levels.

TABLE 2 COMPARISON OF DEMOGRAPHIC ESTIMATES FOR THE SPECIFIC PLAN AREA			
Data Source	Households	Population	Employment
2016-2040 RTP/SCS (2021 interpolated)	2,000	6,000	5,400
ACS (2014-2018) ¹	1,700	6,200	n/a
LEHD (2017) ²	n/a	n/a	5,600 ³
Assessor Parcel Data (2021)	2,100	n/a	n/a
Note: A lag time for the public release of most of the data sources, such as ACS and LEHD, is typical. All numbers are rounded to the nearest one hundred. 1. U.S. Census Bureau, 2014-2018 American Community Survey 2. Longitudinal Employer-Household Dynamics (LEHD on the Map) 3. The estimated total does not include self-employed jobs but includes multiple jobs held by one person.			

FUTURE PROJECTIONS

The Proposed Plan is intended to plan for anticipated growth by 2040 (the planning horizon year), and as explained above, uses the adopted 2016-2040 SCAG RTP/SCS (2016 RTP/SCS) as a resource for both the baseline (also called Existing Conditions) population, housing, and employment estimates and future projections for the 2040 horizon year.

The 2016 RTP/SCS projection for 2040 factors in recent and past trends, key demographic and economic assumptions, and local, regional, state or national policies. The Great Recession had a significant impact on household, population, and employment trends. Growth is still anticipated in SCAG's six-county region but at a slower pace. SCAG's projection assumes that regional growth will be approximately 0.7 percent per year on average for households and population, while employment is also forecast to grow at

0.7 percent per year.⁴

■ Projections (SCAG)

SCAG prepares regional and jurisdictional forecasts or projections. Regional employment forecasts are based on a set of national employment forecasts using a shift-share model. The population forecast uses the cohort-component model, which adds to the existing population conditions the projected number of persons living in group quarters, births, and persons moving into the region and subtracts the number of projected deaths and persons moving out of the region. Households are forecast by multiplying the projected residential population by projected headship rates, or the share of householders in population cohorts based on age-sex-racial/ethnic specific household formation levels. Regional demographic-economic assumptions were also considered in the forecasts and cover issues such as fertility rate, domestic migration, international immigration, and labor force participation rates.

For the jurisdictional forecast, also known as small area forecast, SCAG derives household growth rates and household sizes based on historical trends and the amount of potential development from jurisdictions' general plans and land uses. Population projections are based on household growth and size. Future employment numbers for jurisdictions are based on the share of the county's employment by sector. The major data sources used to develop the jurisdictional forecast include: California Department of Finance (DOF) population and household estimates; California Employment Development Department (EDD) jobs reported by industry; 2010 Census and the latest American Community Survey (ACS) data; Regional Housing Needs Assessment (RHNA) growth projections for 2014 through 2021; and 2014 Business Installment data from infoGroup. Local jurisdictions also provided input and comments to SCAG and adjustments were made.

For the City of Los Angeles, SCAG distributes the total citywide number among all of the city's Community Plan Areas by Transportation Analysis Zones (TAZs), again derived from past trends and building upon/compared to TAZ projections of previous adopted Regional Transportation Plans. DCP reviews the proposed SCAG projections based on knowledge of the applicable Community Plan and/or Specific Plan Area(s) and may give feedback based on local knowledge of development trends and development activity observed during the process of developing the RTP/SCS and its projections. An example of input could be advising SCAG to reflect growth in areas with existing or planned transit infrastructure, areas with flexible land use regulations that can allow higher levels of growth and away from hillsides or historic single-family neighborhoods. This local feedback can also include further input based on the effects of local policymaking, such as General Plan, Community Plan or Specific Plan updates, and the mandates of federal and state plans, which are also taken into consideration during the local review process.

See the following SCAG publications for the methodology employed to determine estimates of population, housing, and employment data for the region:

- https://scag.ca.gov/sites/main/files/file-attachments/f2016rtpscs_scsbackgrounddocumentation.pdf
- https://scag.ca.gov/sites/main/files/file-attachments/f2016rtpscs_demographicgrowthforecast.pdf

⁴ 2016 RTP/SCS Demographics Growth Forecast Appendix, April 2016, accessed March 3, 2020, http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_DemographicsGrowthForecast.pdf

■ How Specific Plans Consider SCAG Projections

The City of Los Angeles uses SCAG's projections to plan for the future. The Department of City Planning considers SCAG projections for housing, population, and employment as targets in its long-range planning efforts for Specific Plan Areas when updating specific plans. SCAG provides the demographic expertise in developing regional and citywide projections and works with DCP planners and demographers to refine those projections and their distribution throughout the city, as described previously. At a minimum, Community Plan and Specific Plan updates meet SCAG projections for the City and each Plan Area but in some cases may exceed those projections for certain Plan Areas depending on circumstances such as market demand, development trends, new legislation, the introduction of transit or other infrastructure, etc. This may occur because the available data or information SCAG used during the time it prepared projections changed or because new information became available later. In this respect, the most recently adopted SCAG projections are viewed as targets, and DCP ultimately determines the distribution of citywide growth through adherence to the General Plan Framework and Community Plan goals, objectives, and policies while the citywide projections are being accommodated. This means growth projections within individual Community Plan or Specific Plan Areas by SCAG may be redistributed between Community Plan Areas and/or Specific Plan Areas to meet the SCAG Citywide growth projections.

The table on the next page compares the allocations of population estimates by seven geographic planning areas within the City of Los Angeles for 2021, and the population projections at the horizon year 2040. Using SCAG's 2016 RTP/SCS as the source, the City of Los Angeles as a whole is projected to grow by 13% in population during this time (4,609,000/4,091,000), which over the course of 19 years, is approximately 0.6% growth per year.

The Specific Plan Area is within the Central Los Angeles and East Los Angeles Geographic Planning Areas. Table 4 indicates that the Central Los Angeles Geographic Planning Area, which includes the Downtown, Westlake, Wilshire and Hollywood Community Plan Areas (CPAs), is currently home to approximately 18% of the citywide population, and it is projected that in 2040 the region will be home to approximately 20% of the citywide population. Table 4 also indicates that the East Los Angeles Geographic Planning Area, which includes the Northeast Los Angeles, Silver Lake-Echo Park-Elysian Valley, and Boyle Heights CPAs, is currently home to approximately 10% of the citywide population, and it is projected that the figure will remain approximately 10% by 2040.

It is generally assumed that CPAs would continue to grow consistent with SCAG assumptions of approximately 0.7% growth per year on average across the region and would still need to accommodate at least marginal levels of growth (i.e., it was not assumed that any CPAs would have less population than current existing conditions levels).

TABLE 3 PROJECTED POPULATION GROWTH FOR THE CITY			
Geographic Planning Area	2021 Estimated Population /a/	2040 Projected Population /a/	Projected Population Growth (2021 – 2040) /a/
City of Los Angeles	4,091,000	4,609,000	518,308
South Valley	780,493	875,559	95,066
South Los Angeles	779,803	874,467	94,664
North Valley	734,546	795,498	60,952
Central	738,605	903,743	165,138
West Los Angeles	441,950	497,159	55,209
East Los Angeles	412,614	448,846	36,232
Harbor	202,680	213,603	10,923
/a/ The 2021 estimated population and the 2040 projected population are based on SCAG's 2016-2040 RTP/SCS. Due to rounding, the percentages may not add up to 100 percent.			

TABLE 4 PERCENTAGE OF CITYWIDE POPULATION AND PROJECTED GROWTH			
Geographic Planning Area	% of Citywide 2021 Population /a/	% of Citywide 2040 Projected Population /a/	% Change of Citywide Projected Population Growth (2021 – 2040) /a/
City of Los Angeles	100%	100%	
South Valley	19%	19%	-
South Los Angeles	19%	19%	-
North Valley	18%	17%	-1%
Central	18%	20%	2%
West Los Angeles	11%	11%	-
East Los Angeles	10%	10%	-
Harbor	5%	5%	-
/a/ The 2021 estimated population and the 2040 projected population are based on SCAG's 2016-2040 RTP/SCS. Due to rounding, percentages may not add up to 100 percent.			

HOW GROWTH IS ADDRESSED THROUGH PLANNING AND ZONING

In preparing Community Plan and Specific Plan updates, land use and zoning changes are proposed that will allow for projected growth to be accommodated while meeting the policies of the Framework Element and the Sustainable Community Strategies. During the planning process, technical land use analysis including the study of development trends, and consideration of General Plan policies is conducted to identify appropriate locations and levels of future development. DCP evaluates the geographic distribution of land use designations

and zoning within a Community Plan or Specific Plan Area to see where development potential is warranted. Some areas are expected to remain largely unchanged over time, such as open space areas, and public facilities. In other areas, development could occur as infill development and re-development, such as in multi-family residential areas. There are also some areas where development is directed, such as near transit stations and major corridors with bus lines, in order to increase access to transit, reduce vehicle miles of travel and thereby reduce greenhouse gas emissions and advance the climate change goals of the city and the region. Land use designation and/or zoning are applied to implement the updated land use policies of the City, the Community Plan, and/or the Specific Plan.

Under the Proposed Plan, new developments would be subject to form and frontage regulations that are designed to achieve compatibility with the existing visual character of each of the neighborhoods within the Specific Plan Area. Specifically, Floor Area Ratio limitations and transition height requirements, where appropriate, would help to provide cohesive height and bulk transitions across future structures within the Specific Plan Area. A new project must meet the use and design regulations established in the updated Specific Plan and comply with applicable Environmental Protection Standards to receive approval. Some of the design requirements will result from the planning process and some will result from the environmental review process.

For example, regulations set through the zoning could include limitations on Floor Area Ratio or transition height requirements in certain specific areas of the Specific Plan Area. An environmental standard might require shielding of light source so as to direct light away from adjacent residential uses. These are examples that represent the types and range of regulations that can be applied to reduce potential impacts of new development. Planners will review most projects in the Specific Plan Area through a ministerial process. Where projects exceed the Project Compliance threshold, discretionary review will be applied.

PROPOSED PLAN'S REASONABLE ANTICIPATED DEVELOPMENT

After preparing the Specific Plan update, separate from the demographic projections is the determination of the Reasonable Anticipated Development of the Proposed Plan, or what is reasonably expected to be built out under the Proposed Plan during the planning horizon. On a citywide basis, DCP's goal is to align citywide Reasonable Expected Development for all of the Community and Specific Plans with the total SCAG projection for the City to be consistent with other departments and agencies who plan for and provide public services and infrastructure to the city.

Planners use their educational and professional experience and expertise of land use and zoning standards to make assumptions about where development is likely to occur and at what scale, and create assumptions about the amount of residential, commercial, and industrial development that will occur during the life of the plan to determine the Reasonable Anticipated Development.

These assumptions are established through extensive research and analysis of existing development trends, existing conditions on the ground, project entitlement and building permit data, geographic and historic constraints, age of existing buildings, and the development potential between the existing built conditions and what uses and development intensities the new regulations would allow. Factors such as existing and planned infrastructure improvements are also considered.

Although the Project Planners do significant research relying on a multitude of data sets and market trends are considered while establishing assumptions, determining the Reasonable Anticipated Development involves

making a lot of assumptions. Although the Planning Team are experts on the Specific Plan Area and on the City's land use and zoning plans and laws, the Proposed Plan, with its policies, zoning, and land use changes do not grant permits for or construct any developments. Future unforeseen market changes that either incentivize or inhibit development are unknown at this time, leaving uncertainty in the process of developing assumptions. The Planning Team, including City Planners, Senior City Planners, and a Principal City Planner, use their expertise and the data sets available at the time of EIR preparation to inform the assumptions used in this analysis. These data sets include, but are not limited to the following:

- Real world conditions through field surveys by the Project Planners of every block of the Plan Area to assess vacancy and existing uses
- Assessor data for the entire Plan Area to determine existing unit counts and existing uses
- Uses (residential, commercial, industrial) and development intensities (height, density, FAR) allowed by the existing General Plan land use designations, zoning, and any zoning overlays and Specific Plans.
- Planning entitlements and building permits to assess market trends
- Proposed General Plan land use designations and General Plan objectives and policies and Zoning regulations for the Proposed Plan and Draft EIR Alternatives
- Other applicable regulations or physical conditions that could constrain potential development (such as, historic preservation protections, topography, flood plains, sensitive habitats, institutional facilities, open space)
- Other State or local programs or regulatory schemes active in the Specific Plan Area that are intended to incentivize or facilitate potential development (such as, Community Benefits Programs, reductions in parking near transit infrastructure, tax incentive areas)

Utilizing these data sets and its collective expertise, the Community Planning team make and apply assumptions to the acreage within the Specific Plan Area, to determine the amount of Reasonable Anticipated Development from the Proposed Plan of residential units and non-residential square footage (commercial and industrial) that could be built during the life of the plan. For example, residential land area is multiplied by dwelling units per acre to generate an assumed dwelling unit count, and non-residential land area is multiplied by development potential, applying industry standards of employment density to calculate the total number of employees.

Ultimately, market factors dictate the level of development that occurs. Experience shows that only a percentage of the properties within a Specific Plan Area will be redeveloped within the horizon year, typically 20-25 years, and that even the sites that do redevelop are not always developed to maximum levels allowed by the by-right zoning and various incentive systems available. For this reason, 100 percent build out is a theoretical scenario and is not analyzed, but rather a more reasonable expected level of development is used both to guide proposed land use changes and analyze the potential environmental impacts of those changes. Community planners conduct the analysis of Reasonable Anticipated Development to analyze what level of development would reasonably occur during the life of the plan. While some jurisdictions may conduct a "full build out" analysis, the Specific Plan Area is a highly urbanized area where the most common form of development is infill development. Conducting a full build out analysis would require making the unreasonable assumption that each parcel that is not already fully built out to the Proposed Plan's density and intensity will be wholly redeveloped during the 20-year life of the plan. This is unrealistic due to development constraints including existing historic structures and recently completed developments that are unlikely to be redeveloped. Additionally, it does not reconcile with historic development patterns in the City. A number of factors serve to constrain development, including:

- Physical site constraints (topography, geology, etc.)
- Zoning regulations (requirements for open space, yards, setbacks and height that sometimes limit the maximum development on a site to levels below what the zoning would otherwise permit)
- Public review process
- Environmental factors and constraints (adjacent uses, sensitive uses, local, state and federal laws)
- Historic preservation goals and regulations
- Historical development patterns
- Land values
- Market factors, (economy, financial lending practices, etc.)

DCP considers these factors in using its best judgement, based on the education, experience and knowledge of its Planning Team, to determine the Reasonably Anticipated Development for the Proposed Plan. Revisions to the Reasonably Anticipated Development from the onset of the Specific Plan Update may occur considering the multi-year time frame that specific plans take to update.

SCAG's METHODOLOGY DOCUMENTATION REPORTS

SCAG Methodology for RTP/SCS 2016 is available online at

- https://scag.ca.gov/sites/main/files/file-attachments/f2016rtpscs_scsbackgrounddocumentation.pdf
- https://scag.ca.gov/sites/main/files/file-attachments/f2016rtpscs_demographicgrowthforecast.pdf