

## **IV. Environmental Impact Analysis**

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### **K. 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 North 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. 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 and SCAG Region were used. Potential growth-inducing impacts of the Project are further addressed in Section VI, Other CEQA Considerations, of this Draft EIR.

#### **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:
  - Framework Element;
  - Housing Element;
  - Central City North Community Plan;
- Green New Deal;
- 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; and
- Rent Stabilization Ordinance.

### (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 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 April 4, 2024, SCAG adopted Connect SoCal–, which is its 20242050 Regional Transportation Plan/Sustainable Communities Strategy (2024–

2050 RTP/SCS). Using growth forecasts and economic trends, the 2024–2050 RTP/SCS provides a vision for transportation throughout the region through 2050 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, 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; (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.

As discussed above, on April 4, 2024, SCAG's Regional Council adopted the 2024 Connect SoCal, which is SCAG's 2024–2050 RTP/SCS. The 2024–2050 RTP/SCS is a long-term plan for the Southern California region that details investment in the transportation system and development in communities to meet the needs of the region both today and in the future. The goals for the 2024–2050 RTP/SCS address mobility, communities, environment and economy. The 2024–2050 RTP/SCS also includes growth forecasts through 2050 at the regional, county, and local jurisdictional levels, and Traffic Analysis

Zones (TAZ).<sup>1</sup> However, projections at the jurisdiction level or smaller geographies, including TAZ, are utilized to conduct required modeling and generally illustrate how regional policies and strategies may be reflected at the neighborhood level. They are advisory and non-binding.<sup>2</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>3</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 (General

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<sup>1</sup> *Southern California Association of Governments, 2024 RTP/SCS, Demographics and Growth Forecast Appendix.*

<sup>2</sup> *Southern California Association of Governments, 2024 RTP/SCS, Demographics and Growth Forecast Appendix, p. 46.*

<sup>3</sup> *Southern California Association of Governments, Regional Housing Needs Assessment, 2021.*

Plan Framework), discussed below, and the Community Plan, which guides land use at the level of the community plan area.

*(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>4</sup> General Plan Framework land use policies are implemented at the community level through the City's Community Plans and Specific Plans.

The General Plan Framework also includes population, housing, and employment projections to guide future Community Plan amendments. However, the General Plan Framework 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>5</sup>

The General Plan Framework housing chapter states that housing production has not kept pace with the demand for housing. According to the General Plan Framework, the City has insufficient vacant properties to accommodate the projected population growth and the supply of land zoned for residential development is constrained.<sup>6</sup> The Housing Chapter states that new residential development will require the recycling and/or intensification of existing developed properties.<sup>7</sup> The General Plan Framework 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>8</sup> The Housing Chapter includes goals, objectives and policies to guide future development.<sup>9</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

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<sup>4</sup> *City of Los Angeles, The Citywide General Plan Framework, An Element of the City of Los Angeles General Plan, 1995.*

<sup>5</sup> *City of Los Angeles, The Citywide General Plan Framework, p. 2-2.*

<sup>6</sup> *City of Los Angeles, The Citywide General Plan Framework, Housing Chapter, p. 4-1.*

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

<sup>8</sup> *City of Los Angeles, The Citywide General Plan Framework, Housing Chapter, p. 4-2.*

<sup>9</sup> *City of Los Angeles, The Citywide General Plan Framework, Housing Chapter, pp. 4-4 and 4-6.*

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.”

*(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 2021 RHNA, was adopted by the City Council on November 24, 2021.<sup>10</sup> Policies to note include Policy 1.2.2 that states the City should “[f]acilitate the construction of a range of different housing types that addresses the particular needs of the city’s diverse households.”<sup>11</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>12</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>13</sup> The identified housing needs represent targets to be met and do not establish development caps. The allocation of 456,643 housing units represents more than 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.

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<sup>10</sup> *City of Los Angeles, Housing Element 2021–2029.*

<sup>11</sup> *City of Los Angeles, Housing Element 2021–2029, Chapter 6, p. 247.*

<sup>12</sup> *City of Los Angeles, Housing Element 2021–2029, Chapter 6, p. 246.*

<sup>13</sup> *City of Los Angeles, Housing Element 2021–2029, p. 98.*

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>14</sup>

*(iii) Central City North 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 General Plan Framework at the local level. The community plans consist 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 North Community Plan area.<sup>15</sup> The Community Plan identifies the following applicable population and housing goals, objectives, and policies:

- Objective 1-2: To locate new housing in a manner which reduces vehicular trips and makes it accessible to services and facilities.
  - Policy 1-2.1: Encourage multiple residential development in commercial zones.
- Objective 1-4: To promote and insure the provision of adequate housing for all persons regardless of income, age, or ethnic background.
  - Policy 1-4.1: Promote greater individual choice in type, quality, price, and location of housing.

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<sup>14</sup> *City of Los Angeles, Housing Element 2021–2029, p. 100.*

<sup>15</sup> *The Project is located with the Downtown Community Plan (DTLA 2040) which became effective on January 27, 2025. Since the application for this Project was filed before DTLA 2040 became effective, the provisions of DTLA 2040 do not apply to this Project. As such, the Central City North Community Plan is still the operative land use document for the Project Site, and therefore, DTLA 2040 is not applicable to the Project or Project Site.*

- Policy 1-4.2: Ensure that new housing opportunities minimize displacement of the existing residents.

*(b) 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>16</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.

*(c) 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.

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.

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<sup>16</sup> *City of Los Angeles, LA's Green New Deal: Sustainable City pLAn 2019, 2019.*

*(d) 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 5 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 0.5 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.

*(e) 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 0.5-mile radius of major transit stops.<sup>17</sup> All development 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.

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<sup>17</sup> A 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.

*(f) 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 (CPI). The market areas may be updated by City Council every five years beginning July 1, 2023.

*(g) 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 purposes 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.

*(h) 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.

*(i) 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.

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

Per LAMC Section 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.

*(k) 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.

## b. Existing Conditions

### (1) On-Site Conditions

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is partially developed, with a one-story metal auto repair building and the rear of an existing off-site restaurant and parking areas that encroach onto the Project Site, as well as paved and unpaved areas currently used for transportation operations, construction staging, bus parking and other activities. There is no existing residential population on the Project Site.

### (2) Population

As shown in Table IV.K-1 on page IV.K-15, based on SCAG's 2024–2050 RTP/SCS growth forecasts, the population estimate for the SCAG Region in 2021 is approximately 18,966,875 people.<sup>18</sup> By 2034 (the Project buildout year), the population for the SCAG Region is projected to be approximately 19,876,063 people, an increase of 909,188 people or 4.79 percent.<sup>19</sup>

As provided in Table IV.K-1, based on SCAG's 2024–2050 RTP/SCS growth forecast, the population estimate for the City in 2021 is approximately 3,932,100 people.<sup>20</sup> By 2034, the population for the City is projected to be approximately 4,093,950 people, an increase of approximately 161,850 people or 4.12 percent.<sup>21</sup>

### (3) Housing

As summarized in Table IV.K-1, based on SCAG's 2024–2050 RTP/SCS regional growth forecasts, approximately 6,332,750 households were projected for the SCAG Region in 2021. By 2034, the number of households in the SCAG Region are expected to add

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<sup>18</sup> The 2021 interpolated value is calculated using SCAG's 2019 and 2035 values to find the average population increase between years and then applying that annual increase to 2019:  $[(19,946,000 - 18,827,000) \div 16] \times 2 + 18,827,000 = 18,966,875$  persons.

<sup>19</sup> The 2034 interpolated value is calculated using SCAG's 2019 and 2035 values to find the average population increase between years and then applying that annual increase to 2019:  $[(19,946,000 - 18,827,000) \div 16] \times 15 + 18,827,000 = 19,876,063$  persons.

<sup>20</sup> The 2021 interpolated value is calculated using SCAG's 2019 and 2035 values to find the average population increase between years and then applying that annual increase to 2019:  $[(4,106,400 - 3,907,200) \div 16] \times 2 + 3,907,200 = 3,932,100$  persons

<sup>21</sup> The 2034 interpolated value is calculated using SCAG's 2019 and 2035 values to find the average population increase between years and then applying that annual increase to 2019:  $[(4,106,400 - 3,907,200) \div 16] \times 15 + 3,907,200 = 4,093,950$  persons.

**Table IV.K-1  
SCAG 2024–2050 RTP/SCS Forecast**

<b>Year</b>	<b>Population</b>	<b>Housing</b>	<b>Employment</b>
<b>SCAG Region</b>			
2021	18,966,875	6,332,750	9,089,625
2034	19,876,063	7,241,125	9,828,188
<b>Percent Change</b>	4.79%	14.34%	8.13%
<b>City of Los Angeles<sup>a</sup></b>			
2021	3,932,100	1,436,200	1,974,725
2034	4,093,950	1,680,600	2,109,438
<b>Percent Change</b>	4.12%	17.02%	6.82%
<p><sup>a</sup> Population and housing forecasts for SCAG region and City of Los Angeles are calculated based on linear interpolation between 2019 and 2035 values.</p> <p>Source: SCAG 2024–2050 RTP/SCS, Demographics and Growth Forecast from SCAG’s Connect SoCal Working Group; Eyestone Environmental, 2025.</p>			

another 908,375 households (increase by 14.34 percent) for a total of approximately 7,241,125 households.<sup>22</sup>

Based on SCAG’s 2024–2050 RTP/SCS growth forecast, as provided in Table IV.K-1, approximately 1,436,200 households were projected for the City in 2021. By 2034, the City is expected to add another 244,400 households (an increase of 17.02 percent) for a total of approximately 1,680,600 households.<sup>23</sup>

#### (4) Employment

As summarized above in Table IV.K-1, based on SCAG’s 2024–2050 RTP/SCS regional growth forecasts, approximately 9,089,625 jobs were projected for the SCAG

<sup>22</sup> The 2021 interpolated value is calculated using SCAG’s 2019 and 2035 values for the SCAG region to find the average housing increase between years and then applying that annual increase to 2019:  $[(7,311,000 - 6,193,000) \div 16] \times 2 + 6,193,000 = 6,332,750$  households. The 2034 interpolated value is calculated using SCAG’s 2019 and 2035 values for the SCAG region to find the average housing increase between years and then applying that annual increase to 2019:  $[(7,311,000 - 6,193,000) \div 16] \times 15 + 6,193,000 = 7,241,125$  households.

<sup>23</sup> The 2021 interpolated value is calculated using SCAG’s 2019 and 2035 values for the City of Los Angeles to find the average housing increase between years and then applying that annual increase to 2019:  $[(1,699,400 - 1,398,600) \div 16] \times 2 + 1,398,600 = 1,436,200$  households. The 2034 interpolated value is calculated using SCAG’s 2019 and 2035 values for the City of Los Angeles to find the average housing increase between years and then applying that annual increase to 2019:  $[(1,699,400 - 1,398,600) \div 16] \times 15 + 1,398,600 = 1,680,600$  households.

Region in 2021. By 2034, the number of jobs in the SCAG Region are expected to add another 738,563 jobs (an increase of 8.13 percent) for a total of approximately 9,828,188 jobs.<sup>24</sup>

Based on SCAG's 2024–2050 RTP/SCS growth forecast, as provided in Table IV.K-1, approximately 1,974,725 jobs were projected for the City in 2021. By 2034, the City is expected to add another 134,713 employees (an increase of 6.82 percent) for a total of approximately 2,109,438 jobs.<sup>25</sup>

### 3. Project Impacts

#### a. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, the Project would have a significant impact related to population or housing if it would:

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

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

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

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

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<sup>24</sup> The 2021 interpolated value is calculated using SCAG's 2019 and 2035 values for the SCAG region to find the average employment increase between years and then applying that annual increase to 2019:  $[(9,885,000 - 8,976,000) \div 16] \times 2 + 8,976,000 = 9,089,625$  jobs. The 2034 interpolated value is calculated using SCAG's 2019 and 2035 values for the SCAG region to find the average employment increase between years and then applying that annual increase to 2019:  $[(9,885,000 - 8,976,000) \div 16] \times 15 + 8,976,000 = 9,828,188$  jobs.

<sup>25</sup> The 2021 interpolated value is calculated using SCAG's 2019 and 2035 values for the City of Los Angeles to find the average employment increase between years and then applying that annual increase to 2019:  $[(2,119,800 - 1,954,000) \div 16] \times 2 + 1,954,000 = 1,974,725$  jobs. The 2034 interpolated value is calculated using SCAG's 2019 and 2035 values for the City of Los Angeles to find the average employment increase between years and then applying that annual increase to 2019:  $[(2,119,800 - 1,954,000) \div 16] \times 15 + 1,954,000 = 2,109,438$  jobs.

- 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.

As provided in the impact analysis below, the Project's potential impacts related to threshold (b), displacing substantial numbers of existing people or housing, were fully evaluated in the Initial Study, included as Appendix A of this Draft EIR. As such, these factors and considerations from the City's *L.A. CEQA Thresholds Guide* are not applicable.

## b. Methodology

As evaluated below, the Project's potential impacts related to population, housing, and employment growth are determined based on the proposed number of residential units included in the Project, all of which are conservatively estimated to be occupied (i.e., "households").

The population growth impacts of the Project are determined based on the estimated number of people who would occupy the proposed residential units included in the Project, as well as the indirect population associated with the Project. The Project's population impacts are then compared to population projections from SCAG's 2024–2050 RTP/SCS. Growth forecasts for the SCAG Region and the City of Los Angeles were derived based on linear interpolations of data from SCAG and DCP for the Project's baseline year (2021) and the Project's buildout year (2034).

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

With respect to employment, the focus of environmental analysis prepared under CEQA is a project's potential to cause effects on the *physical* environment.<sup>26</sup> Accordingly, the CEQA Guidelines state that while economic or social information may be included in an EIR, or may be presented in whatever form(s) the lead agency desires, social and economic

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<sup>26</sup> "Environment" means the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, and objects of historic or aesthetic significance (Public Resources Code [PRC] Section 21060.5).

effects shall not be treated as significant effects on the environment.<sup>27</sup> The CEQA Guidelines are very clear in that there must be a physical change resulting from the project directly or indirectly for an impact to be considered significant.<sup>28</sup>

However, social and economic effects, including employment, are relevant CEQA issues to the extent that anticipated social and economic changes arising from a proposed project may result in physical changes.<sup>29</sup> Additionally, if a project's physical impacts would cause social or economic effects, the magnitude of the social or economic effects may be relevant in determining whether a physical impact is "significant."<sup>30</sup> If the physical change causes adverse economic or social effects on people, those adverse effects may be used as the basis for determining that the physical change is significant.<sup>31</sup>

In order to determine if the Project's employment growth would induce substantial unplanned population growth in the area, the Project's direct employment increases are compared to SCAG's employment growth projections for the SCAG region and the City. Future projections were derived based on linear interpolations of data from SCAG and DCP for the Project's baseline year (2021) and the Project's buildout year (2034).

### c. Project Design Features

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

### d. Analysis of Project Impacts

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

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<sup>27</sup> CEQA Guidelines Sections 15131(a) and 15064(f); see also PRC Sections 21100 and 21151. "Significant effect on the environment" means a substantial, or potentially substantial adverse change in the environment (PRC Section 21068).

<sup>28</sup> See discussion following CEQA Guidelines Section 15131.

<sup>29</sup> CEQA Guidelines Sections 15131(a) and 15064(f).

<sup>30</sup> CEQA Guidelines Section 15131(b). For example, a project's direct and indirect population can be used to estimate the amount of natural resources, energy resources, and public services that might be consumed as a result of the project, and whether the resulting scale of use is "significant."

<sup>31</sup> CEQA Guidelines Section 15064(f).

## (1) Impact Analysis

### (a) Construction Impacts

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

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

It is reasonable to assume, therefore, based on these factors that Project-related construction workers would not relocate their households' places of residence as a direct consequence of working on the Project. **Thus, the Project would not induce substantial unplanned population growth in the area during construction. Therefore, construction-related impacts associated with population and housing would be less than significant.**

### (b) Operation

#### (i) Direct Population Impacts

As discussed in Section II, Project Description, of this Draft EIR, the Project would construct 986 residential units including 200 affordable units, approximately 15,000 square feet of retail uses; and 23,800 square feet of restaurant uses. Based on population generation rates published by LADOT and DCP, the Project's 986 residential units could generate a residential population of approximately 2,399 persons at full buildout.<sup>32</sup>

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<sup>32</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, Table 1. They are in residents per* (Footnote continued on next page)

As illustrated in Table IV.K-2 on page IV.K-21 based on SCAG's 2024–2050 RTP/SCS, the estimated population of 2,399 persons generated by the Project would represent approximately 0.26 percent of the projected growth in the SCAG region between 2021 and 2034 (i.e., the Project's baseline and buildout years),<sup>33</sup> and 1.48 percent of the projected growth in the City of Los Angeles during the same period.<sup>34</sup> As such, the 2,399 new residents generated by the Project would be within and, thus, consistent with SCAG growth forecasts, constituting a small percentage of projected City and regional growth. SCAG population projections continue to increase in horizon years (e.g., 2050), so if the Project were completed in a future year, the Project's population would necessarily be a smaller component of future population or housing units anticipated in the 2024–2050 RTP/SCS.

Furthermore, the Project would result in new multi-family housing located near transit, which is encouraged by both the 2024–2050 RTP/SCS and the City's General Plan. The Project's commercial components and contributions to walkable communities including public open space amenities including promenades and pedestrian linkages to the Metro Chinatown Station would also contribute to the attainment of the SCAG policies. The Project's population growth would also contribute to an infill growth pattern that is encouraged locally in the City by the General Plan Framework and the Central City North Community Plan. While the Project has the potential to induce population growth, the growth is accounted for in the SCAG 2024–2050 RTP/SCS as shown above, including for the SCAG region and the City of Los Angeles Subregion. Additionally, as discussed above, the growth associated with the Project would be distributed in a manner consistent with local planning efforts. **As such, the Project would not directly induce substantial unplanned population growth, and therefore Project impacts related to population growth would be less than significant.**

#### *(ii) Direct Housing Impacts*

As stated in many adopted regional and local planning documents, including the City's Housing Element, the City remains in need of new dwelling units to serve both current and projected populations. While the Project would not eliminate the housing shortage in the City, it would incrementally advance the goal of generating more housing for the region in a developed, infill location. As shown in Table IV.K-3 on page IV.K-22 the 986 residential units

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*residential unit, and include: Multi-Family Residential = 2.25 and Affordable Housing-Family = 3.14. Therefore,  $(786 * 2.25) + (200 * 3.14) = 2,397$ . However, because the VMT calculator itself uses 2.2533455879541 residents per multifamily unit, the resulting population is 2,399  $(786 * 2.2533455879541) + (200 * 3.14) = 2,399$ .*

<sup>33</sup>  $2,399 \text{ Project residents} \div 909,188 \text{ Regional population growth between 2021 and 2034} \times 100 = 0.26 \text{ percent.}$

<sup>34</sup>  $2,399 \text{ Project residents} \div 161,850 \text{ City population growth between 2021 and 2034} \times 100 = 1.48 \text{ percent.}$

**Table IV.K-2  
Project Percentage Share of 2021–2034 Growth**

	<b>Project Impact</b>	<b>Percent of SCAG Regional Growth</b>	<b>Percent of City of Los Angeles Growth</b>
<b>Population</b>	2,399 persons <sup>a</sup>	0.26%	1.48%
<b>Housing</b>	986 units	0.11%	0.40%
<b>Employment</b>	146 employees <sup>b,c</sup>	0.02%	0.11%

<sup>a</sup> *Population generation factors by use type from the Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation Version 1.3, May 2020, Table 1. Multi-Family Residential = 2.25 and Affordable Housing-Family = 3.14. Therefore, (786 \* 2.25) + (200 \* 3.14) = 2,397. However, because the VMT calculator itself uses 2.2533455879541 residents per multifamily unit, the resulting population is 2,399 (786\* 2.2533455879541) + (200 \* 3.14) = 2,399.*

<sup>b</sup> *Employee generation factors by use type from the Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation Version 1.3, May 2020, Table 1. They are in employees per 1,000 square feet, and include: General Retail = 2.0; High Turnover Sit-down Restaurant = 4.0.*

<sup>c</sup> *To provide for a conservative analysis and consistency with the Transportation Assessment provided in Appendix K of this Draft EIR, the Project does not take credit for the existing employees on site.*

*Source: SCAG 2024–2050 RTP/SCS; LADOT and DCP, City of Los Angeles VMT Calculator Documentation Version 1.3, May 2020; Eyestone Environmental, 2025.*

included in the Project would represent approximately 0.11 percent of the projected housing growth in the SCAG Region between 2021 and 2034,<sup>35</sup> and 0.4 percent of the projected housing growth in the City during the same period.<sup>36</sup> Accordingly, the Project would not cause housing growth in an undeveloped area or exceed projected/planned levels for the Project's buildout year that would result in an adverse physical change in the environment. The Project would also provide housing in proximity to existing nearby public transit stops that connect the area to the greater Los Angeles region. Further, the Project would provide a range of multi-family housing types, including affordable housing, to further the goals of the City's Housing Element and help the City meet its Regional Housing Needs Assessment obligations. **As such, while the Project would bring additional housing growth to the City, the addition of housing units would help meet the City's fair share of the regional housing need, and therefore would not directly cause substantial unplanned population growth. Therefore, Project impacts related to housing growth would be less than significant.**

<sup>35</sup> *986 Project dwelling units ÷ 909,375 Regional housing growth between 2021 and 2034 x 100 = 0.11 percent.*

<sup>36</sup> *986 Project dwelling units ÷ 244,400 City housing growth between 2021 and 2034 x 100 = 0.40 percent.*

**Table IV.K-3  
Population, Housing, and Employment Estimates**

No.	Project Location	Land Use	Size	Population <sup>a</sup>	Housing	Employees <sup>b</sup>
1	1101 North Main Condos 1101 N. Main St.	Condominiums	318 du	716	318	
2	Mixed-Use 511 N. Grand Ave	Apartments	299 du	673	299	
		Retail	8,000 sf			16
3	Hill Mixed-Use Project 708 N. Hill St.	Apartments	162 du	365	162	
		Retail	5,000 sf			10
4	Alpine Mixed-Use 211 W. Alpine St.	Apartments	160 du	360	160	
		Retail	2,499 sf			5
5	College Station Mixed-Use 129 W. College St., 924 N. Spring St.	Apartments	725 du	1631	725	
		Commercial	51,600 sf			104
6	Ferrante 1000 W. Temple St.	Apartments	1,500 du	3375	1,500	
		Retail	30,000 sf			60
7	1201 North Broadway Mixed-Use 1201 N. Broadway	Apartments	118 du	266	118	
		Office/ Commercial	8,800 sf			18
8	169 North Avenue 21	Residential	95 du	214	95	
		Affordable Housing	5 du	16	5	
		Hotel	100 rm			50
		Retail	4,946 sf			10
9	643–655 North Spring Street 643–655 N. Spring St.	Apartments	294 du	662	294	
		Hotel	149 rm			75
		Commercial	15,878 sf			32
10	Data Center 900 N. Alameda St.	Data Center	179,900 sf			720
11	942 North Broadway 942 N. Broadway	Residential	169 du	380	169	
		Affordable Housing	9 du	28	9	
		Restaurant and Office Space	35,805 sf			144
12	Sunset Boulevard Mixed-Use (Holy Hill Mixed-Use) 1111 W. Sunset Blvd.	Apartments	737 du	1658	737	
		Hotel	180 rm			90
		Hotel Retail	10,000 sf			20
		Hotel Restaurant	10,000 sf			40
		Office	48,000 sf			192
		Retail/Gym/ Grocery	50,000 sf			100
		Restaurant	25,000 sf			100

**Table IV.K-3 (Continued)**  
**Population, Housing, and Employment Estimates**

No.	Project Location	Land Use	Size	Population <sup>a</sup>	Housing	Employees <sup>b</sup>
13	843 North Spring Street Mixed-Use 843 N. Spring St.	Office and Restaurant Space	100,517 sf			402
14	Mixed-Use 1457 N. Main St.	Live-Work	244 du	549	244	
		Retail	9,829 sf			20
15	Clean Water Campus Project	Office	150,000 sf			600
16	Stadium Way and Chavez Ravine Apartments 959 E Stadium Wy.	Apartments	237 du	533	237	
		Affordable Housing	30 du	94	30	
17	Pagoda Hotel 995 N. Broadway	Hotel	101 rm			51
		Restaurant	6,211 sf			25
18	1011 North Broadway 1009–1015 North Broadway	Hotel	92 rm			46
		Restaurant	1,713 sf			7
		Café/Retail	895 sf			2
		Café	978 sf			4
19	1635 North Main Street 1635 N. Main St.	Office	140,000 sf			560
		Retail	5,000 sf			10
		Restaurant	8,000 sf			32
20	TRJLA Mixed-Use 717 N. Hill St.	Apartments	411 du	925	411	
		Affordable Housing	39 du	122	39	
		Retail	17,140 sf			34
21	College Street Residential Project 871 N. Figueroa Ter.	Apartments	153 du	344	153	
		Affordable Housing	17 du	53	17	
22	950 Stadium Way Residential 950 E Stadium Wy.	Apartments	57 du	128	57	
		Affordable Housing	8 du	25	8	
23	130 W. College Street	Office	224,597 sf			898
		Retail	4,110 sf			8
		Restaurant	5,894 sf			24
24 <sup>c</sup>	Los Angeles State Historic Park Pedestrian Bridge					
25	Los Angeles Aerial Rapid Transit (LA ART)					20 <sup>d</sup>
<b>Total for Related Projects</b>				<b>13,117</b>	<b>5,787</b>	<b>4,525</b>
<b>Total for Project (net)</b>				<b>2,399</b>	<b>986</b>	<b>146</b>
<b>Total for Related Project plus Project</b>				<b>15,516</b>	<b>6,773</b>	<b>4,673</b>
<i>du = dwelling units</i>						

**Table IV.K-3 (Continued)**  
**Population, Housing, and Employment Estimates**

No.	Project Location	Land Use	Size	Population <sup>a</sup>	Housing	Employees <sup>b</sup>
<p><i>rm = rooms</i>  <i>sf = square feet</i></p> <p><sup>a</sup> <i>Population generation factors by use type from the Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation Version 1.3, May 2020, Table 1. They are in residents per residential unit, and include: Multi-Family Residential = 2.25 and Affordable Housing-Family = 3.14.</i></p> <p><sup>b</sup> <i>Employee generation factors by use type from the Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation Version 1.3, May 2020, Table 1. They are in employees per 1,000 square feet, and include: General Retail = 2.0; General Office 4.0; High Turnover Sit-down Restaurant = 4.0; Hotel = 0.5; and Supermarket = 4.0.</i></p> <p><sup>c</sup> <i>Related Project 24 is not anticipated to generate population, housing, or employment.</i></p> <p><sup>d</sup> <i>Based on the Los Angeles Aerial Rapid Transit Project Draft Environmental Impact Report, October 2022.</i></p> <p><i>Source: Eyestone Environmental, 2025 based on data provided by Gibson Transportation Consulting, 2024, the City of Los Angeles Department of Transportation, and the City of Los Angeles Department of City Planning.</i></p>						

*(iii) Indirect Population, Housing, and Employment Growth*

In addition to providing 986 new residential units, the Project would include 15,000 square feet of retail uses; and 23,800 square feet of restaurant uses. As shown on Table IV.K-2 on page IV.K-21 based on employee generation rates provided by LADOT and DCP the proposed commercial uses would result in approximately 146 employees and would represent approximately 0.02 percent of the projected employment growth in the SCAG Region between 2021 and 2034,<sup>37</sup> and 0.11 percent of the projected employment growth in the City during the same period.<sup>38</sup>

These employment positions would include a range of permanent and part-time positions that may be filled, in part, by persons already residing in the vicinity of the workplace and who generally do not relocate their households due to such employment opportunities, and other persons who would commute to the Project Site from other communities in and outside of the City. As such, the Project would not indirectly induce substantial population growth associated with potential employment opportunities that may be generated by the Project.

<sup>37</sup> *146 new Project employees ÷ 738,563 Regional employment growth between 2021 and 2034 x 100 = 0.02 percent.*

<sup>38</sup> *146 new Project employees ÷ 134,713 City employment growth between 2021 and 2034 x 100 = 0.11 percent.*

With regard to housing, any indirect demand for housing associated with the proposed uses, including any generated by the increased transit capacity, would be fulfilled by a combination of the Project's new dwelling units, vacancies in the surrounding housing market, and from other new units in the vicinity of the Project Site. As such, the Project's indirect housing demand would not cause housing growth to exceed projected/planned levels for the Project's buildout year, and the Project's indirect impacts on housing would be less than significant.

With regard to infrastructure, as previously discussed above, the Project Site is located within a developed area with existing utilities, services, and roadway infrastructure. As such, infrastructure is already available in the Project Site vicinity, and any utility and other infrastructure improvements that may be required by the Project would be necessary to connect the proposed uses to the existing main infrastructure system. Thus, the Project would not create new opportunities for potential area population growth through the proposed infrastructure improvements (i.e., indirectly spurring growth by providing new connection opportunities to an area that currently does not have access to such service systems). Additionally, all circulation improvements planned as part of the Project are intended to improve circulation flows and safety throughout the Project Site and vicinity. Thus, the Project would not indirectly induce substantial unplanned population growth through the provision of new access routes or roadways. **Based on the above, the Project would not indirectly induce substantial population and housing growth in the area by creating permanent employment opportunities, extending roads, or expanding infrastructure. Therefore, Project operational impacts related to indirect population growth would be less than significant.**

*(c) Conclusion*

**The Project would not induce substantial unplanned population growth in an area, either directly or indirectly. Therefore, the Project would result in less than significant impacts related to induced substantial unplanned population growth.**

**(2) Mitigation Measures**

Project-level impact related to substantial unplanned population growth would be less than significant. Therefore, no mitigation measures are required.

**(3) Level of Significance After Mitigation Measures**

Project-level impacts related to substantial unplanned population growth were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impacts level remains less than significant.

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

As evaluated in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, there are no existing housing units or a residential population on the Project Site, and the Project would not displace any existing people or housing necessitating the construction of replacement housing elsewhere. **Therefore, impacts with respect to Threshold (b) would not occur. No further analysis is required.**

## **e. Project Impacts with Long-Term Buildout**

While Project buildout is anticipated in 2034, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2047. The Mitigation Monitoring Program would continue to regulate development of the Project Site and provide for the implementation of all applicable Project design features and mitigation measures associated with any development activities during and beyond the term of the Development Agreement. Additionally, based on forecasts in the 2024–2050 RTP/SCS, the population, households, and employment generated by the Project, would be consistent with growth projections, at a later buildout date would not affect the impacts or significance conclusions presented above.

## **f. Cumulative Impacts**

### **(1) Impact Analysis**

As identified in Section III, Environmental Setting, of this Draft EIR, 25 related projects in the surrounding area are assumed to be constructed and/or operational during the same time period as the Project.

Table IV.K-3 on page IV.K-22 shows estimates for population, housing, and employment generated by each related project. Further discussion of these estimates is provided in Table IV.K-4 on page IV.K-27 to contextualize the impact of the related projects within the City of Los Angeles Subregion and overall SCAG Region.

#### ***(a) Population***

As shown in Table IV.K-4, the Project's residential uses would generate approximately 2,399 persons, and the related projects containing residential land uses would generate a population of approximately 13,117 persons for a total cumulative population of approximately 15,516 persons. As discussed above, based on forecasts in the 2024–2050 RTP/SCS, the City is projected to have a population of approximately 4,093,950 persons in 2034. The cumulative population resulting from the Project and related projects would

**Table IV.K-4  
Cumulative Population and Housing Impacts**

	<b>Population (people)<sup>b</sup></b>	<b>Housing (units)</b>	<b>Employment (Jobs)<sup>c,d</sup></b>
Proposed Project Increase <sup>a</sup>	2,399	986	146
<i>Total Related Projects Increase</i>	13,117	5,787	4,525
<b>Cumulative (Project + Related Projects) Increase</b>	<b>15,516</b>	<b>6,773</b>	<b>4,671</b>
SCAG Region Projection, 2034	19,876,063	7,241,125	9,828,188
SCAG Region Growth, 2021–2034	909,188	908,375	738,563
City of Los Angeles Projection, 2034	4,093,950	1,680,600	2,109,438
City of Los Angeles Growth, 2021–2034	161,850	244,400	134,713
<b>Cumulative (Project + Related Projects) Percentage of SCAG Region Forecast in 2034</b>	0.08%	0.09%	0.05%
<b>Cumulative (Project + Related Projects) Percentage of City of Los Angeles Forecast in 2034</b>	0.38%	0.40%	0.22%
<p><sup>a</sup> To provide for a conservative analysis and consistency with the Transportation Assessment provided in Appendix K of this Draft EIR, the Project does not take credit for the existing employees on site.</p> <p><sup>b</sup> Population generation factors by use type from the Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation Version 1.3, May 2020, Table 1. They are in residents per residential unit, and include: Multi-Family Residential = 2.25 and Affordable Housing-Family = 3.14.</p> <p><sup>c</sup> Employee generation factors by use type from the Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation Version 1.3, May 2020, Table. They are in employees per 1,000 square feet, and include: General Retail = 2.0; General Office 4.0; and High Turnover Sit-down Restaurant = 4.0</p> <p>Source: SCAG 2024–2050 RTP/SCS; Eyestone Environmental, 2025.</p>			

represent approximately 0.38 percent of the City's projected population in 2034.<sup>39</sup> Also, the cumulative population of 15,516 persons would represent approximately 9.59 percent of the City's population growth between 2021 and 2034.<sup>40</sup> Moreover, the Project and many of the related Projects would result in new multi-family housing located in close proximity to public transportation, which is encouraged by both the 2024–2050 RTP/SCS and the City's General Plan. **Therefore, the population generated by the Project and related projects would**

<sup>39</sup>  $(2,399 \text{ Project residents} + 13,117 \text{ related projects residents}) \div 4,093,950 \text{ City 2034 population count}) \times 100 = 0.38 \text{ percent.}$

<sup>40</sup>  $(2,399 \text{ Project residents} + 13,117 \text{ related projects residents}) \div 161,850 \text{ City 2021 to 2034 population growth}) \times 100 = 9.59 \text{ percent.}$

**be within and, thus, consistent with SCAG growth forecasts, and would not result in significant cumulative impacts. The Project's contribution to the estimated population growth in the City of Los Angeles would not be cumulatively considerable, and cumulative impacts on population would be less than significant.**

*(b) Housing*

As shown in Table IV.K-4 on page IV.K-27 the 986 households proposed by the Project and the 5,787 households generated by the related projects would result in a total of 6,773 households. Based on forecasts in the 2024–2050 RTP/SCS, the City is projected to include 1,680,600 households in 2034. As such, the 6,773 households resulting from the Project and related projects would account for approximately 0.40 percent of the City's projected households in 2034.<sup>41</sup> Also, the 6,773 households would represent approximately 2.77 percent of the City's projected household growth between 2021 and 2034.<sup>42</sup> Moreover, the Project's housing and many of the related projects would be developed with multi-family housing, furthering the goals of the City's Housing Element and help the City meet its Regional Housing Needs Assessment obligations. **Therefore, the households generated by the Project and the related projects would be within and, thus, consistent with SCAG growth forecasts and would not result in significant cumulative impacts. The Project's contribution to the estimated housing growth in the City would not be cumulatively considerable, and cumulative impacts on housing would be less than significant.**

*(c) Employment*

As shown in Table IV.K-4, the 146 new employees to be generated by the Project, and the 4,525 employees to be generated by the related projects, would together generate an estimated 4,671 cumulative employees. Based on forecasts in the 2024–2050 RTP/SCS, the City is projected to generate an estimated 134,713 increase in employees between 2021 and 2034 and have a total of 2,109,438 employees by 2034. As such, the 4,671 employees to be generated by the Project and the related projects would together represent only approximately 3.47 percent of the City's projected increase in employees between 2021 and 2034<sup>43</sup> and only approximately 0.22 percent of the City's total employees in 2034.<sup>44</sup>

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<sup>41</sup>  $(986 \text{ Project housing units} + 5,787 \text{ related projects housing units}) \div 1,680,600 \text{ City 2034 housing count}) \times 100 = 0.40 \text{ percent.}$

<sup>42</sup>  $(986 \text{ Project housing units} + 5,787 \text{ related projects housing units}) \div 244,400 \text{ City 2021 to 2034 housing growth}) \times 100 = 2.77 \text{ percent.}$

<sup>43</sup>  $(146 \text{ Project employees} + 4,525 \text{ related projects employees}) \div 134,713 \text{ City of Los Angeles 2021 to 2034 employment increase}) \times 100 = 3.47 \text{ percent.}$

<sup>44</sup>  $(146 \text{ Project employees} + 4,525 \text{ related projects employees}) \div 2,109,438 \text{ City 2034 employment projection}) \times 100 = 0.22 \text{ percent.}$

**Therefore, the employees generated by the Project together with the related projects would be within and, thus, consistent with SCAG growth forecasts and would not result in significant cumulative impacts. The Project's contribution to the estimated employment growth in the City would not be cumulatively considerable, and cumulative impacts on employment would be less than significant.**

## (2) Mitigation Measures

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

## (3) Level of Significance after Mitigation

Cumulative impacts related to population and housing 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.