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## IV. Environmental Impact Analysis

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### N.2 Employment, Housing and Population - Housing

#### 1. Introduction

This section is based upon the technical report entitled *An Assessment of the Employment, Housing and Population Impacts of the NBC Universal Evolution Plan*, prepared by HR&A, Inc. (2010) and attached to this Draft EIR as Appendix P. This section describes current and future trends and projections of the size and characteristics of housing in the City of Los Angeles and the Southeast San Fernando Valley. It then evaluates the Project in terms of the Southern California Association of Governments' (SCAG) housing growth forecast for the City of Los Angeles Subregion and, for informational purposes, the Southeast San Fernando Valley. The analysis also addresses Project consistency with SCAG, City, and County housing policies. The Project's impact on the subregional jobs-housing balance is evaluated as well. This section also discusses the housing implications should the Project's proposed annexation and detachment proposals not be adopted.

#### 2. Environmental Setting

##### a. Geographical Areas Analyzed

Due to the regional nature of the Project, and the scale at which housing markets operate, the analysis of potential Project impacts is presented in terms of the following geographic areas.

##### (1) City of Los Angeles Subregion

SCAG divides its six-county planning area into 14 subregions. The Project Site is located within the City of Los Angeles Subregion. In addition to all areas within the boundaries of the City of Los Angeles, this subregion also includes the City of San Fernando, unincorporated Los Angeles County areas and certain property owned by the state and federal governments.

## (2) Southeast San Fernando Valley

The Southeast San Fernando Valley subarea of the City of Los Angeles is included in this discussion for informational purposes only as it has no official status as a planning area for SCAG or the City or County. The area referenced as the Southeast San Fernando Valley is roughly bordered on the west by the San Diego Freeway (I-405), on the south by Mulholland Drive, on the north by the Metrolink right-of-way that runs from approximately Roscoe Boulevard southeast to Vanowen Street, and on the east by the City of Los Angeles border with the City of Burbank. This area corresponds to the City Community Plan areas of Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass; Van Nuys-North Sherman Oaks; and North Hollywood-Valley Village.

## (3) Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan area

Most of the Project Site is an unincorporated area that is not included in the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan and therefore use of the Community Plan area alone is not appropriate for this analysis. As a result, the Community Plan is not addressed in the statistical analysis but is addressed in terms of policies.

## b. Regulatory Framework

### (1) SCAG Plans

#### (a) SCAG Regional Growth Forecast

Based on SCAG's 2004 Forecast, the City of Los Angeles Subregion had approximately 1.30 million households in 2000, and 1.37 million in 2008.<sup>584</sup> By 2010, SCAG forecasts an increase to 1.39 million households, increasing to 1.66 million in 2030. These household forecasts represent a growth of approximately 295,000 additional households (an increase of 22.1 percent) within the City of Los Angeles subregion between 2008 and 2030.

In the Southeast San Fernando Valley, the Department of City Planning estimates there were approximately 146,000 households in 2000. It is estimated, based on review of Department of City Planning estimates for 2005 and the SCAG forecasts for 2005 and 2010, that there are approximately 152,000 households in this area in 2008. By 2030, the SCAG forecast implies an increase to approximately 182,500 households, representing a

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<sup>584</sup> Southern California Association of Governments 2004 regional growth forecast projects "households," not housing units. As defined by the U.S. Census Bureau, "households" are equivalent to occupied housing units.

growth of approximately 30,800 additional households from 2008 through 2030 (an increase of 20.3 percent).<sup>585</sup>

*(b) SCAG Regional Comprehensive Plan and Guide*

The Southern California Association of Governments Regional Comprehensive Plan and Guide was adopted by the member agencies of the Southern California Association of Governments to set broad goals for the Southern California region and identify strategies for agencies at all levels of government to guide their decision-making.<sup>586</sup> It includes input from each of the 14 subregions that make up the Southern California region (comprised of Los Angeles, Orange, San Bernardino, Riverside, Imperial, and Ventura Counties). Adopted 1996 Regional Comprehensive Plan and Guide policies related to housing are contained primarily in Chapter 6 of the 1996 Regional Comprehensive Plan and Guide. The Housing Chapter of the 1996 Regional Comprehensive Plan & Guide is not a mandated component of the plan and is provided for information and advisory purposes. SCAG is very clear that the recommendations included in the Housing Chapter to fulfill the stated goals and objectives do not create any new legal mandates for local governments.

The Housing Chapter recognizes the fundamental need to balance high housing costs with substantial population growth while recognizing that housing construction may lag behind future housing demand. The policy framework set forth in the Housing Chapter seeks to implement goals that address the provision of decent and affordable housing choices for all people, the provision of an adequate supply and availability of housing, the maintenance and preservation of the existing stock, and promoting a mix of housing opportunities regionwide. To implement these goals the Housing Chapter identifies a series of strategies and recommendations. One of the key principles identified by SCAG to implement these goals calls for an emphasis on comprehensive planning which focuses on the pattern of housing location that provides for a more compact and balanced urban form.

*(c) SCAG Southern California Compass Growth Vision Report*

The SCAG Southern California Compass Growth Vision Report (“Compass Growth Vision”), published in June 2004,<sup>587</sup> presents a comprehensive growth vision for the six-

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<sup>585</sup> Southern California Association of Governments 2004 Regional Transportation Plan Small Area Forecast, based on sum of household forecast values for the group of census tracts that correspond to the boundaries of the Southeast San Fernando Valley, per the City of Los Angeles Department of City Planning specification of census tracts in the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass, North Hollywood-Valley Village and Van Nuys-North Sherman Oaks Community Plan areas.

<sup>586</sup> Southern California Association of Governments, *Regional Comprehensive Plan and Guide*, March 1996.

<sup>587</sup> Southern California Association of Governments, *Southern California Compass Growth Vision Report*, June 2004.

county SCAG region, as well as the achievements of the process for developing the growth vision. It details the evolution of the draft vision from the study of emerging growth trends and systematic modeling of the effects of alternative growth pattern scenarios on transportation systems, land consumption, and other factors.

The Compass Growth Vision Report notes that population and household growth trends and existing housing conditions point to an unmet demand for a greater diversity of housing throughout the six-county region.<sup>588</sup> For example, while existing multi-family units account for a substantial proportion of the overall supply (i.e., approximately 40 percent), multi-family buildings are being added to the total housing stock at a much lower proportion. As a result, the demand for such housing (e.g., from young adults and seniors, etc.) is outpacing multi-family housing production.<sup>589</sup>

*(d) SCAG Regional Housing Needs Assessment*

The SCAG Regional Housing Needs Assessment is a key tool for SCAG and its member governments to plan for this growth. The most recent Regional Housing Needs Assessment was approved by the SCAG Regional Council in July 2007 and quantifies the need for housing within each jurisdiction between 2006 and 2014. Communities then plan, consider and decide how they will address this need through the process of completing the housing elements of their general plans. The Regional Housing Needs Assessment does not necessarily encourage or promote growth, but rather allows communities to anticipate growth, so that they can grow in ways that enhance quality of life, and improve access to jobs, transportation and housing, without adversely impacting the environment. The Regional Housing Needs Assessment is produced periodically by SCAG, as mandated by State law, to coincide with the region's schedule for preparing housing elements. It consists of two measurements of housing need: (1) existing need; and (2) future need.

The existing needs assessment is based on data from the most recent U.S. Census to measure ways in which the housing market is not meeting the needs of current residents. These variables include the number of low-income households paying more than 30 percent of their income for housing, as well as severe overcrowding. The future need for housing is determined primarily by the forecasted growth in households in a community, based on historical growth patterns, job creation, household formation rates, and other factors, to estimate how many households will be added to each community over the projection period. The housing need for new households is then adjusted to account for an ideal level of vacancy needed to promote housing choice, maintain price competition, and encourage acceptable levels of housing upkeep and repair. The Regional Housing

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<sup>588</sup> *Id.*, p. 10.

<sup>589</sup> *Id.*

Needs Assessment also accounts for units anticipated to be lost due to demolition, natural disaster, or conversion to non-housing uses. The sum of these factors—household growth, vacancy need, and replacement need—form the “construction need” assigned to each community. The City of Los Angeles was assigned a Regional Housing Needs Assessment construction need of 112,876 units for the 2006 to 2014 planning period, or an average of approximately 15,000 units per year.<sup>590</sup> By comparison, the City produced an average of 9,278 units per year over the past five years.<sup>591</sup> The unincorporated areas of Los Angeles County were assigned a Regional Housing Needs Assessment construction need of 57,176 units for the 2006 to 2014 planning period or an average of approximately 7,624 per year.

Finally, the Regional Housing Needs Assessment considers how each jurisdiction might grow in ways that will decrease the concentration of low income households in certain communities. The need for new housing is distributed among income groups so that each community moves closer to the regional average income distribution.

## (2) City of Los Angeles Plans

### *(a) City of Los Angeles General Plan Framework Element*

As noted in Section IV.N.1, Employment, the City’s General Plan addresses community development goals and policies relative to the distribution of land use, both public and private, including housing. To the extent that the Project’s Mixed-Use Residential Area is annexed into the City of Los Angeles as proposed, the General Plan’s housing policies would apply to the proposed Project. In the event the proposed annexation does not occur, the City’s housing policies would apply to those portions of the Mixed-Use Residential Area currently within the City that would remain in the City.

The Framework Element incorporates the adopted housing goals for the City from the 1993 Housing Element, as follows:

- An adequate supply of housing accessible to persons of all income levels;
- Sufficient ownership and rental housing to meet the City’s needs;

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<sup>590</sup> Southern California Association of Governments, *Final Regional Housing Need Allocation Plan - Planning Period (January 1, 2006 - June 30, 2014) for Jurisdictions within the Six-County SCAG Region*, (approved by the SCAG Regional Council on July 12, 2007).

<sup>591</sup> City of Los Angeles Department of City Planning, *residential building permit data*, website: <http://cityplanning.lacity.org/DRU/HomeBldg.cfm>).



- Housing production incentives for for-profit and non-profit developers of housing for low- and very-low income households;
- A reduction in barriers leading to more housing;
- Housing opportunities accessible to all City residents without discrimination, including groups with special needs;
- A City of residential neighborhoods that maintains a sense of community by conserving and improving the existing housing stock;
- Housing, jobs, and services in mutual proximity; and
- Energy efficient housing.

The Framework Element also provides policy direction for future amendments to the Housing Element, and establishes the following Framework Element housing goal:

- A distribution of housing opportunities by type and cost for all residents of the City.

*(b) City of Los Angeles General Plan Housing Element*

The Housing Element of the City's General Plan identifies as its overall goal the creation of a city of livable and sustainable neighborhoods with a range of housing types and costs in mutual proximity to jobs, infrastructure and services.<sup>592</sup> The Housing Element contains several housing objectives for the City, which include the following:

- Encourage production and preservation of an adequate supply of rental and ownership housing to meet the identified needs of persons of all income levels and special needs;
- Encourage the provision of housing with support services for persons with special needs (e.g., homeless, mental or physical disability, elderly, large families, and persons living with HIV/AIDS);
- Promote housing strategies which enhance neighborhood safety and sustainability, and provide for adequate population, development, and

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<sup>592</sup> *City of Los Angeles Department of City Planning, Housing Element, City of Los Angeles General Plan, adopted December 18, 2001, website: <http://www.cityofla.org/PLN>. An updated Housing Element covering the period 2006-2014 was adopted by the City Council on August 13, 2008. The Housing Element adopted in 2001 is the operative standard for this analysis because that was the Housing Element in effect when the Project's Notice of Preparation was issued in 2007. However, the Project's relationship to the 2006-2014 Housing Element is also addressed in the analysis.*

infrastructure and service capabilities within the City and each community plan area, or other pertinent service area;

- Encourage the location of housing, jobs, and services in mutual proximity;
- Accommodate a diversity of uses that support the needs of the City's existing and future residents;
- Develop, preserve, and enhance quality single- and multiple-family housing utilizing approved design standards which maintain the prevailing scale and character of the City's stable residential neighborhoods, and do not constrain affordable housing development; and
- Assure that new development is generally consistent with the character and scale of adjacent development and an adopted community vision.

### (3) Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan

The overarching residential goal of the Community Plan is to provide for a safe and secure residential environment for all economic, age, and ethnic segments of the community. Specifically, the Community Plan strives to designate specific lands to provide for adequate multi-family residential development; locate new housing in a manner which reduces vehicular trips and makes it accessible to services and facilities; preserve and enhance the varied and distinct residential character and integrity of existing single and multi-family neighborhoods; preserve and enhance neighborhoods with a distinctive and significant historical character; promote and insure the provision of adequate housing for all persons regardless of income, age, or ethnic background; and limit the intensity and density in hillside areas.

Existing residential land use patterns in the Community Plan area are quite varied, even within subareas (e.g., hillside versus flat lands), and, accordingly, range from very low (less than one unit per acre) to medium (up to 109 units per acre) density.

The Housing Chapter of the Community Plan includes advisory strategies for bringing housing costs and decent shelter within reach of more households in order to support the economic health and social vitality of the region. Its goals include providing for decent and affordable housing for all people; an adequate supply and availability of housing; housing stock maintenance and preservation; and promoting a mix of housing opportunities regionwide.

#### (4) County of Los Angeles General Plan

The Los Angeles County General Plan Housing Element would be applicable to the Project if the portion of the Mixed-Use Residential Area currently within the County were not annexed to the City of Los Angeles as proposed. The County General Plan's Housing Element includes the following goals:<sup>593</sup>

- A wide range of housing types sufficient to meet the needs of current and future residents, particularly persons and households with special needs, including but not limited to lower-income households, senior citizens, and the homeless;
- A housing supply that ranges broadly enough in price and rent to enable all households, regardless of income, to secure adequate housing;
- Neighborhoods that protect the health, safety, and welfare of the community, and that enhance public and private efforts to maintain, reinvest in, and upgrade the existing housing supply;
- Accessibility to adequate housing, employment centers and availability of community services for all persons, without discrimination, in accordance with federal and state fair housing laws;
- An adequate supply of housing preserved and maintained in sound condition, located within neighborhoods that are safe, decent and healthful, and absent of excessive noise; and
- An ongoing planning and monitoring function focused on housing that promotes the provision of affordable housing, and ensures the long-term availability of developments that provide affordable housing.

### c. Regional and Citywide Housing Setting

#### (1) Overview

Between 1990 and 1994, housing construction in the City came to a virtual standstill as a result of the national recession, which was particularly severe and longer lasting in the Southern California region. Construction began to accelerate toward the middle of the decade, and approached the pace of the pre-recession period through 2006, before the

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<sup>593</sup> *County of Los Angeles Department of Regional Planning, Housing Element 1998-2005, Los Angeles County General Plan, adopted October 31, 2001, Chapter 8. An updated version of the County of Los Angeles Housing Element, 2008-2014 was adopted by the Board of Supervisors on August 5, 2008. The operative standard for this analysis is, the 1998-2005 Housing Element, which was in effect when the Project's Notice of Preparation was issued in 2007. However, the Project's impacts with respect to the 2008-2014 Housing Element are also addressed in the analysis.*

early effects of the current recession affected the housing market. Population and household growth and, hence, demand for housing, did not abate during this recession period and has accelerated since it ended, along with a resurgence in employment growth. As a result, the state as a whole, the Southern California region and the City are undersupplied with housing with respect to demand. This housing production shortfall is part of the reason that California has one of the tightest and most expensive housing markets in the nation. The median existing home price in Los Angeles County peaked at \$605,300 in August 2007, when only 23 percent of Los Angeles County first-time buyer households could afford to buy a median-priced home. Although the median price for existing homes has declined to \$339,980 as of August 2009, still only 56 percent of first-time buyers can afford the median-priced home.

In 1999, the Los Angeles City Council passed a motion instructing the City's Housing Department to convene a task force that would make recommendations to alleviate the shortage of safe, decent and affordable housing within the City of Los Angeles. The Housing Crisis Task Force ("Task Force") Report (Report) found that, in addition to having the greatest housing shortage in the nation, Los Angeles rents and purchase prices were becoming so out of reach that average income families, including those working in essential public services (i.e., school teachers, health care workers, and public safety workers), were moving to distant suburbs, while prices in many of the City's single-family areas remain affordable only to high-income households. According to the Report, this inability to house important sectors of its workforce threatens the City's economic health. This situation has become even more problematic in the years since publication of the Report. Between 2000 and mid-2007, the median price of all homes sold in Los Angeles County increased 176 percent before plummeting during the current recession. Even with the significant price reductions resulting from the national recession, still only 56 percent of first time buyers can afford to buy a median priced home as of August 2009.

One source of this problem, according to the Task Force, is local land use patterns based on community plans that emphasize single-family housing and automobile transportation, which have decreased the supply of residential land available for development to nearly zero. It notes that of about 125,000 acres of the City's land area devoted to residential uses, 84 percent is single-family development and only about 16 percent is multi-family development. The Report further notes that most of the potential residential development capacity available through zoning would have to be constructed on land already being used for residential or commercial buildings, and observes that accommodating projected growth will require easing land use restrictions to permit more multi-family uses in mixed residential areas and on underutilized or obsolete commercial and industrial properties.

In order to increase the housing supply and develop more affordable units, the Report states that the City must revise its zoning and building codes to create additional building sites, increase the number of possible units, and reduce development costs.

The Report also cited the need for a more flexible building envelope, removing barriers to mixed use development, providing greater flexibility in lot sizes, and continuing the reform of permit processing to make it easier for the public to file applications and obtain approvals. It also called on the City to work with the development community to find new ways to assemble sites in the City's underutilized commercial and industrial areas and with neighborhood groups to create more home ownership opportunities in selected areas using smaller lots. In addition, the Report recommended rezoning more property for multi-family use and facilitating mixed-use projects, noting that available vacant parcels for housing development are often not large enough for profitable development and that it is difficult and time consuming to assemble parcels into sites large enough for building. The Report's recommendations favoring higher-density residential development on infill sites have been supported by the City's Planning and Housing Departments and by City of Los Angeles Mayor Villaraigosa.

According to the City of Los Angeles Department of City Planning estimates, the Southeast San Fernando Valley contained 155,647 dwelling units in 2006. This total accounted for approximately 11 percent of the Citywide housing stock of approximately 1.41 million dwelling units and 5 percent of the Countywide housing stock of 3.11 million dwelling units. Compared with the City and County, the housing stock in the Southeast San Fernando Valley has a lower vacancy rate and a smaller proportion of units in detached single-family units. The City's housing stock represents about 41 percent of the housing stock in the County, according to the Census Bureau's 2006 American Community Survey. Compared with the County, the City's housing stock features a higher vacancy rate, a higher proportion of multi-family housing, higher median home value, but lower median rent, as of 2006. City median household income was also lower than in the County in both 2000 and 2006.

## (2) Housing Characteristics of Existing Project Site Employees

In 2008, an Employee Survey was conducted for current employees working at the Project Site. As part of the Employee Survey, employees listed the city and postal zip code in which they reside, and provided the same information about their immediately prior residence. In addition, employees indicated how long they had worked at the Project Site, as well as how long they had resided at their current address. These data form the basis for the analysis of existing Project Site employee household mobility.

According to the Employee Survey results, almost all (99.7 percent) employees moved at least once during their job tenure at the Project Site. However, only some of

these moves resulted from taking a job at the Project Site. In order to make this distinction, survey data on the length of time each employee had lived at his or her current address was compared to data on the length of time that individual had been employed at the Project Site. For those few employees who did not move since they took their job at the Project Site, the job opportunity at the Project Site was assumed to have no impact on the housing location decision for those employees. Among the group of employee “movers,” those who moved within one year of taking their job at the Project Site were most likely to have made a job-related decision about relocating their household, but only if the move was in a direction closer to the Project Site. In all, approximately six percent (842 employees) of the approximately 13,800 employees at the Project Site today reported that they had moved to a nearer city closer to the Project Site within one year of taking their job at the Project Site. The 2008 Employee Survey data indicate that the employee households who moved closer to the Project Site within one year of the employee taking a job at the Project Site have the following household characteristics:

- A median household size of slightly more than two persons;
- A higher likelihood that the employee at the Project Site is the primary wage earner in the household, compared to all employees; and
- Somewhat more likely likelihood to reside in a rented dwelling than is the case for all employees, and less likely likelihood to reside in a home the household owns.

These are the employees who, as a result of employment opportunities at the Project Site, had some job-related effect on the local housing stock.

### **3. Environmental Impacts**

#### **a. Methodology**

Housing growth impacts are assessed in terms of the Project’s relationship to applicable adopted SCAG growth forecasts and City and County housing policies.

#### **b. Thresholds of Significance**

In accordance with the City’s CEQA Thresholds Guide (2006), the Project would have a significant impact on housing if:

- It would cause growth (i.e., new households or housing), or accelerate development in an undeveloped area, that exceeds projected/planned levels for

the year of Project buildout and that would result in an adverse physical change in the environment;

- It is not compatible with adopted local and regional employment, housing or population growth policies, including jobs/housing balance, as set forth in the County's General Plan, the City's General Plan, and the Southern California Association of Government's (SCAG) Regional Comprehensive Plan and Guide.
- The Project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and
- The Project represents a substantial amount of growth which would not occur without implementation of the Project.

### **c. Project Design Features**

No project design features are proposed with regard to housing.

### **d. Project Impacts**

#### **(1) 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 significant degree, to relocate their households as a consequence of the 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 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.

Therefore, it is reasonable to assume that Project-related construction workers would not relocate their households' places of residence as a consequence of working on

the Project. As a result, impacts to City or subregional housing due to Project construction would be less than significant.

## (2) Operational Impacts

### (a) SCAG Plans

#### (i) Consistency with SCAG's Regional Growth Forecast

The results of the 2008 Employee Survey discussed previously in this section, as adjusted to reflect the differences in the proportions of job categories under the Project as compared to existing conditions at the Project Site and applying the household mobility pattern analysis described above, yield an estimate of the Project's probable indirect impacts on housing. It is estimated that approximately 10 percent of net new Project employee households (i.e., 387 employees) are likely to move as a direct result of Project employment, and that about six percent of net new Project employee households (i.e., 232 employees) would move to a city that is closer to the Project Site.

Similar to existing employee households who moved closer to the Project Site after the start of employment at the Project Site, net new Project employee households who are anticipated to do likewise are predicted to have the following characteristics: a slightly smaller median household size; the employee is slightly less likely to be the primary wage earner in the household; and have a greater likelihood to reside in a rented dwelling than in a home the household owns as compared to all employees.

The Project's 2,937 housing units, plus an indirect housing demand of 232 units generated by new Project employees, represents approximately 0.2 percent of the households forecast for 2030 in the City of Los Angeles Subregion, or approximately one percent of the remaining growth forecast for the years between 2008 and 2030. Therefore, the Project would not induce substantial housing growth, because it would meet a portion of forecasted housing need and would not exceed the housing growth forecast for SCAG's City of Los Angeles Subregion. The Project's households, assuming all planned units are occupied, plus indirect housing demand generated by the Project's direct new employees, represent less than two percent of the households forecast for 2030 in the Southeast San Fernando Valley and about 10 percent of the remaining household growth forecast between 2008 and 2030. Since the Project's housing would not exceed SCAG's projections for the Subregion which includes the entire Project Site (including both the City and County components), the scale of housing impact relative to the regional forecast remains the same whether or not the proposed annexation occurs and places the Mixed-Use Residential Area entirely within the City of Los Angeles. As a result, the Project's impacts in terms of adopted growth forecasts are considered to be less than significant. The Project is compared to the adopted SCAG forecast in Table 190 on page 2067.



**Table 190**  
**Project Housing Compared With Adopted SCAG Housing Forecasts**

Projection Year	Households
<b>Regional Projections</b>	
SCAG City of Los Angeles Subregion 2030	1,663,000
SCAG City of Los Angeles Subregion 2008-2030 Growth	294,530
Southeast San Fernando Valley 2030	182,541
Southeast San Fernando Valley 2008-2030 Growth	30,826
<b>Project Dwelling Units/Households</b>	
Direct (on-site housing)	2,937
Indirect (employee demand)	232
<b>Total</b>	<b>3,169</b>
<b>Percentage of SCAG Forecast</b>	
Share of SCAG City of Los Angeles Subregion 2030	0.19%
Share of SCAG City of Los Angeles Subregion 2008-2030 Growth	1.08%
Share of Southeast San Fernando Valley 2030	1.74%
Share of Southeast San Fernando Valley 2008-2030 Growth	10.28%

*Source: Southern California Association of Governments; HR&A, Inc., 2010; Matrix Environmental, 2010.*

*(ii) Consistency with SCAG's Regional Comprehensive Plan and Guide*

In addition to being consistent with SCAG's household growth forecast for the City of Los Angeles Subregion, the Project would be compatible with the housing policies set forth in SCAG's Regional Comprehensive Plan and Guide. For example, the Project would provide opportunities for a range of housing choices by providing a new, high-quality residential development that provides a range of market rate housing prices and types. In addition, the Project would make an important contribution to expanding the regional housing supply at an infill location near existing jobs, community resources, and infrastructure. The degree to which the Project is consistent with policies relevant to population and housing included in the Growth Management Chapter of the Regional Comprehensive Plan and Guide is presented in Table 191 on page 2068.

SCAG has recently issued a Draft 2008 Regional Comprehensive Plan. For the reasons described above, the Project's Mixed-Use Residential Area would also be consistent with the housing-related goals in the 2008 Draft Regional Comprehensive Plan, including creating areas of mixed-use development and walkable, "people-scaled" communities; providing new housing opportunities with building types that respond to the region's changing demographics; targeting growth in housing, employment and commercial development within walking distance of existing and planned transit; and injecting new life into under-used areas by creating vibrant new business districts, redeveloping old buildings and building new businesses and housing on vacant land.

**Table 191  
Comparison of the Project to the Applicable Housing Policies of the  
Regional Comprehensive Plan and Guide**

Regional Comprehensive Plan and Guide Policies	Analysis of Consistency
<b><i>Growth Management Chapter Policies</i></b>	
<p><b>Policy 3.01:</b> The population, housing and jobs forecasts, which are adopted by SCAG's Regional Council and reflect local plans and policies, shall be used by SCAG in all phases of implementation review.</p>	<p><b>Compatible:</b> The Project is located in the City of Los Angeles Subregion. As presented in the above analysis, as well as in Section IV.N.1, Employment, and IV.N.3, Population of this Draft EIR, the Project falls within all SCAG forecasts. With respect to SCAG's 2030 forecasts, the Project's 5,193 on-site jobs represent approximately 1.7 percent of forecasted employment growth for the Subregion; its 2,937 new multi-family units represent approximately one percent of forecasted household growth; and the combined direct household population and indirect employment-related population of 7,146 persons represents approximately 2.4 percent of SCAG's population forecast for the Subregion.</p>
<p><b>Policy 3.04:</b> Encourage local jurisdictions' efforts to achieve a balance between the types of jobs they seek to attract and housing prices.</p>	<p><b>Compatible:</b> The Project would add 2,937 new residential units for individuals and families to the Universal City area, one of the region's designated employment centers. According to the SCAG regional growth forecast, the Los Angeles Subregion's ratio of jobs to households (1.38) currently exceeds the regional ratio (1.34), and it is therefore considered "jobs rich and housing poor."</p> <p>By 2030, the SCAG forecast indicates the Subregional ratio will improve to 1.36, slightly "housing rich," compared to the region in that year (1.36 vs. 1.38). While the Project would add jobs at a rate that exceeds the subregional average, the additional jobs are not of a sufficient magnitude to alter the forecasted subregional jobs/housing ratio. The Project would provide jobs with a range of salaries and housing with a range of prices, and provide work force housing to meet the needs of those in the area.</p>
<p><b>Policy 3.17:</b> Support and encourage settlement patterns which contain a range of urban densities.</p>	<p><b>Compatible:</b> The Project would be an infill development that contributes to satisfying an unmet need for infill housing proximate to employment; a policy that is contained in the SCAG's 1996 Regional Comprehensive Plan and Guide. Consistent with the Air Quality Management Plan and 1996 Regional Comprehensive Plan and Guide, the City's Housing Crisis Task Force Report, promulgated in 2000, recommended the reconsideration of low-density, single-family land use designations because they contribute to the creation of the region's housing crisis and attendant adverse environmental impacts such as air pollution from urban sprawl and automobile commuting trips.</p> <p>The Project's households would also represent about 0.2 percent of the households forecasted for 2030 in the City of Los Angeles Subregion, or about one percent of the household growth forecast between 2008 and 2030. Therefore, the Project</p>

**Table 191 (Continued)**  
**Comparison of the Project to the Applicable Housing Policies of the**  
**Regional Comprehensive Plan and Guide**

Regional Comprehensive Plan and Guide Policies	Analysis of Consistency
	<p>would not induce substantial housing growth, because it would meet a portion of the forecasted need, rather than exceeding the household growth forecast for SCAG's City of Los Angeles Subregion.</p> <p>The Project's 2,937 housing units and an indirect housing demand allowance of 232 units from net new Project employees, assuming these units are all occupied, would represent less than two percent of the households forecast for 2030 in the Southeast San Fernando Valley and approximately 10.0 percent of the remaining household growth forecast between 2008 and 2030.</p> <p>The Project would also address housing needs that are currently unmet and are contributing to urban sprawl and associated automobile trip emissions which are in conflict with the 1996 Regional Comprehensive Plan and Guide and Air Quality Management Plan. The Project would also bring more housing units closer to major employment centers. This additional density would be located in an area currently served by public transit, and would be located near existing transportation corridors. The Project's proposed multi-family units provide housing closer to jobs at densities that are consistent with the Vehicle Miles Traveled reduction strategies of the 1996 Regional Comprehensive Plan and Guide and Air Quality Management Plan.</p>
<p><b>Policy 3.24:</b> Encourage efforts of local jurisdictions in the implementation of programs that increase the supply and quality of housing and provide affordable housing as evaluated in the Regional Housing Needs Assessment.</p>	<p><b>Compatible:</b> Under the Project as proposed, the 2,937 new multi-family units would assist the City of Los Angeles to address a chronic undersupply of housing in general, as discussed in the City's Housing Element and Task Force Report (discussed above), and multi-family units in particular. This would assist the City to meet its Regional Housing Needs Assessment for the 2006-2014 Housing Element planning period, which was recently adopted by SCAG. Should the proposed annexation not be implemented, the Project would also assist the County to meet its Regional Housing Needs Assessment objective. Although the Project's specific unit pricing has not been established at this time, the Applicant is considering providing a range of housing opportunities including work force housing (i.e., rentals at 200 percent of area median income). This may not, however, accommodate households in the lowest income categories.</p>
<p><b><i>Housing Chapter Policies</i></b></p>	
<p>Provide for decent and affordable housing for all people.</p>	<p><b>Compatible:</b> The Project as proposed would increase the housing supply in the City of Los Angeles Subregion by 2,937 market rate, multi-family units. The Project would provide new home ownership and rental opportunities for a broad</p>

**Table 191 (Continued)**  
**Comparison of the Project to the Applicable Housing Policies of the**  
**Regional Comprehensive Plan and Guide**

Regional Comprehensive Plan and Guide Policies	Analysis of Consistency
	range of households. Although the Project’s specific unit pricing has not been established at this time, the Applicant is considering providing a range of housing opportunities including work force housing (i.e., rentals at 200 percent of area median income). This may not, however, accommodate households in the lowest income categories.
Provide an adequate supply and availability of housing.	<b>Compatible:</b> As previously discussed, the Project would add 2,937 units to the City or County’s supply of housing, depending on whether or not the proposed annexation is implemented, consistent with SCAG’s regional growth policies and forecasts for the City of Los Angeles Subregion and the Southeast San Fernando Valley, as well as the City and County Housing Element policies for meeting housing demand.
Promote a mix of housing opportunities regionwide.	<b>Compatible:</b> The Project would expand the supply of housing available in the City of Los Angeles Subregion by adding 2,937 units. It would also expand the mix of housing, by offering multi-family housing opportunities in a variety of building types and styles.
Jobs/Housing Balance	<b>Compatible:</b> By adding new jobs and new housing, the Project would have a neutral numerical impact on what is projected to be an improving subregional balance between housing and jobs. <sup>a</sup> The City of Los Angeles Subregion is currently considered by SCAG to be “jobs rich/housing poor.” This is because the ratio between its current number of jobs and households (1.38) exceeds the comparable ratio for the region as a whole (1.34), which is considered to be “balanced” overall. By 2030, with development of proportionally more housing than jobs, the Subregion will be somewhat more “housing rich” than the region. While the Project would add jobs at a rate that exceeds the subregional average, the additional jobs are not of a sufficient magnitude to alter the forecasted subregional jobs/housing ratio.
<p><sup>a</sup> <i>The concept of “jobs-housing balance,” and some of the difficulties in measuring it and applying it as a regional strategy, are discussed in the Growth Management Chapter of SCAG’s Regional Comprehensive Plan and Guide (pp. 3-12 to 3-13). See also, Ed Hamilton, Francine Rabinovitz, John H. Alschuler, Jr. and Paul J. Silvern, “Applying the Concept of Jobs-Housing Balance,” Urban Land, October 1991, pp. 15-18. Nevertheless, the general concept of achieving better jobs-housing balance remains a fundamental part of SCAG growth management strategies, including the Compass Growth Vision, and related air quality policies.</i></p> <p>Source: HR&amp;A, Inc., 2010; Matrix Environmental, 2010.</p>	

*(iii) Consistency with City of Los Angeles General Plan Housing Goals and Policies*

Should the proposed annexation occur, the entire Mixed-Use Residential Area residential component would be within the City of Los Angeles. If the proposed annexation does not occur, a portion of the Mixed-Use Residential Area would remain in the County, and the areas currently within the City would remain in the City. In either case, the Project would be compatible with the housing policies set forth in the City's General Plan Framework and Housing Elements. For example, by adding new units to the City's housing supply the Project would make an important incremental contribution to meeting the City's "fair share" of regional housing need in the current Regional Housing Needs Assessment that will apply to the next update of the City's Housing Element. The Project's mix of uses provides opportunities for the co-location of jobs and housing. It would provide a residential environment that adds to the range of housing opportunities across the household income spectrum, although it would not include units for those with the lowest incomes. It would also provide new opportunities for home ownership for both individuals and families. And, through its design and implementation of environmental mitigation measures listed in the Draft EIR, the Project would help buffer existing residential neighborhoods from non-residential uses on the Project Site.

The degree to which the Project would be compatible with the housing goals in the City's General Plan Framework and 1998-2005 Housing Elements is presented in Table 192 on page 2072, whereas the Project's compatibility with the housing goals of the City's 2006-2014 Housing Element is presented in Table 193 on page 2075.

*(iv) Consistency with the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Housing Goals, Objectives and Policies*

By adding new units to the City's housing supply, the Project would provide a new residential community that adds to the range of housing opportunities. It would also provide new opportunities for home ownership and rental housing for both individuals and families. And, through its design and implementation of environmental mitigation measures listed in the Draft EIR, the Project would protect existing residential neighborhoods that surround the Project Site from adverse environmental impacts.

*(v) Consistency with the County of Los Angeles General Plan Housing Element*

If the portion of the proposed Mixed-Use Residential Area currently within the County is not annexed to the City and remains within the County, the Project's housing would be consistent with the County's Housing Element goals. For example, by adding

**Table 192**  
**Comparison of the Project to the Applicable Housing Goals and Policies**  
**of the City of Los Angeles General Plan Framework and 1998-2005 Housing Element**

General Plan Policies	Analysis of Project Consistency
<b>General Plan Framework Element Policies</b>	
<b>Goal 1:</b> An adequate supply of housing accessible to persons of all income levels.	<b>Compatible:</b> The Project's 2,937 new multi-family units would assist the City of Los Angeles to address a chronic undersupply of housing in general, as discussed in the City's Housing Element and Task Force Report, and for multi-family units in particular. In the event the proposed annexation does not occur, it is estimated that approximately 1,178 units would be located in the City. In either case, the Project would assist the City to meet its Regional Housing Needs Assessment for the 2006-2014 Housing Element planning period, which was recently adopted by SCAG. Although the Project's specific unit pricing has not been established at this time, the Applicant is considering providing a range of housing opportunities including work force housing (i.e., rentals at 200 percent of area median income). This may not, however, accommodate households in the lowest income categories.
<b>Goal 2:</b> Sufficient ownership and rental housing to meet the City's needs.	<b>Compatible:</b> The Project's 2,937 new multi-family units would contribute to the City's overall housing needs. In the event the proposed annexation does not occur, it is estimated that approximately 1,178 units would be located in the City. Based on current planning forecasts, the Project would provide approximately 60 percent ownership units (approximately 1,760 condominiums and townhomes) and 40 percent renter-occupied units (approximately 1,175 rentals). <sup>594</sup>
<b>Goal 3:</b> Housing production incentives for for-profit and non-profit developers of housing for low- and very-low income households.	<b>Compatible:</b> No incentives from the City to develop low- and very low-income housing as part of the Project are currently planned.
<b>Goal 4:</b> A reduction in barriers leading to more housing.	<b>Not Applicable:</b> This is a goal related to actions to be taken by the City and therefore does not apply to the Project.
<b>Goal 5:</b> Housing opportunities accessible to all City residents without discrimination, including groups with special needs.	<b>Compatible:</b> All Project housing units would be made available without discrimination against protected population groups, consistent with applicable federal and state fair housing laws.
<b>Goal 6:</b> A City of residential neighborhoods that maintains a sense of community by conserving and improving existing housing stock.	<b>Compatible:</b> The Project envisions creating a new Mixed-Use Residential Area with its own sense of community where no housing currently exists. Adjacent to the proposed Mixed-Use Residential Area are existing off-site residential neighborhoods (e.g., Hollywood Manor). Therefore, the Project would provide new housing and residential amenities adjacent to existing residential neighborhoods and would be consistent with this goal. In addition, the Project would not involve a reduction in the existing housing stock.

<sup>594</sup> This tenure type mix is for analytic purposes only. The actual tenure type mix would be in response to market conditions at the time of actual development.

**Table 192 (Continued)**  
**Comparison of the Project to the Applicable Housing Goals and Policies**  
**of the City of Los Angeles General Plan Framework and 1998-2005 Housing Element**

General Plan Policies	Analysis of Project Consistency
<b>Goal 8:</b> Housing, jobs, and services in mutual proximity.	<b>Compatible:</b> The Project includes a mix of neighborhood -serving retail uses, residential and community facilities in proximity to one another.
<b>Goal 9:</b> Energy efficient housing.	<b>Compatible:</b> The Project would be designed and constructed to comply with all applicable energy conservation standards. In addition, the Mixed-Use Residential Area development has been accepted into the LEED-ND (Neighborhood Development) pilot project and would seek LEED-ND certification.
A distribution of housing opportunities by type and cost for all residents of the City.	<b>Compatible:</b> The Project's 2,937 new multi-family units would contribute to meeting the City's overall housing needs for both ownership and rental housing. Based on current planning forecasts, the Project would provide approximately 60 percent ownership units (approximately 1,760 condominiums and townhomes) and 40 percent renter-occupied units (approximately 1,175 rentals).  As noted above, although the Project's specific unit pricing has not been established at this time, the Applicant is considering providing a range of housing opportunities including work force housing (i.e., rentals at 200 percent of area median income). This may not, however, accommodate households in the lowest income categories.
<b>General Plan Housing Element (1998-2005) Objectives</b>	
Encourage production and preservation of an adequate supply of rental and ownership housing to meet the identified needs of persons of all income levels and special needs.	<b>Compatible:</b> The Project's 2,937 new multi-family units would contribute to meeting the City's overall housing needs for both ownership and rental housing. Based on current planning forecasts, the Project would provide approximately 60 percent ownership units (approximately 1,760 condominiums and townhomes) and 40 percent renter-occupied units (approximately 1,175 rentals).  As noted above, although the Project's specific unit pricing has not been established at this time, the Applicant is considering providing a range of housing opportunities including work force housing (i.e., rentals at 200 percent of area median income). This may not, however, accommodate households in the lowest income categories.
Encourage the provision of housing with support services for persons with special needs (e.g., homeless, mental or physical disability, elderly, large families, and persons living with HIV/AIDS).	<b>Compatible:</b> While the Project is not specifically planned to accommodate special needs housing, it should be noted that such households would not be prevented from occupying housing units.
Promote housing strategies which enhance neighborhood safety and sustainability, and provide for adequate population, development, and infrastructure and service capabilities within the City and each community plan area, or other pertinent	<b>Compatible:</b> The Project involves preparation and approval of a proposed Specific Plan and this EIR through which the Project's land uses, infrastructure, and services would all be specified and coordinated. The design of the Mixed-Use Residential Area includes a range of unit types and neighborhood-serving retail uses, and community facilities, which would be designed with attention to

**Table 192 (Continued)**  
**Comparison of the Project to the Applicable Housing Goals and Policies**  
**of the City of Los Angeles General Plan Framework and 1998-2005 Housing Element**

General Plan Policies	Analysis of Project Consistency
service area.	public safety and environmental sustainability.
Encourage the location of housing, jobs, and services in mutual proximity.	<b>Compatible:</b> The Project proposes a mix of neighborhood -serving retail uses, residential, and community facilities that are located in proximity to one another.
Accommodate a diversity of uses that support the needs of the City’s existing and future residents.	<b>Compatible:</b> The new housing opportunities provided by the Project are intended to accommodate existing residents from the surrounding region seeking a more compact, urban, mixed-use residential experience that also includes commercial opportunities (e.g., neighborhood-serving retail uses), as well as new residents who may move into the area.
Develop, preserve, and enhance quality single-and multi-family housing utilizing approved design standards which maintain the prevailing scale and character of the City’s stable residential neighborhoods, and do not constrain affordable housing development.	<b>Compatible:</b> The Project envisions creating a new Mixed-Use Residential Area with its own sense of community where no housing currently exists, so this objective does not directly apply to the Project. The Project’s housing component would be developed adjacent to an existing residential neighborhood and would not have an adverse impact on the development of affordable housing.
Assure that new development is generally consistent with the character and scale of adjacent development and an adopted community vision.	<b>Compatible:</b> On an overall basis, the proposed Project’s new amphitheater, entertainment retail, entertainment, studio, studio office, office, hotel, neighborhood-serving retail, and other commercial uses would provide new jobs, shopping, dining, and other attractions that would reduce the need for existing Project area residents, employees, and hotel guests to travel to other areas of the City for these amenities. The scale of development within the proposed Mixed-Use Residential Area represents a significant adverse impact with regard to a portion of the neighboring Hollywood Manor community (approximately 13 homes); mitigation measures are proposed to address this impact in Sections IV.A.2 (Land Use - Physical) and IV.D (Visual Resources) of this Draft EIR. Both distance as well as physical buffers (e.g., roadways, the Hollywood Freeway, the Lakeside Golf Club) would serve to continue to separate the Project Site from most other surrounding land uses to the north, east, and south such that the proposed Project would not impact the character, scale, or vision of these communities.
<hr/> <p><i>Source: HR&amp;A, Inc., 2009; Matrix Environmental, 2009.</i></p>	

new units to the County’s housing supply, the Project would provide a range of housing opportunities across the household income spectrum, including a variety of new home ownership opportunities. Through development standards consistent with those set forth in within the proposed City Specific Plan, the Project would serve to protect the health, safety, and welfare of the community, as well as provide a substantial private investment in this



**Table 193**  
**Comparison of the Project to the Applicable Housing Goals of the**  
**City of Los Angeles General Plan 2006 – 2014 Housing Element**

Housing Element Goals	Analysis of Project Consistency
<b>Goal 1:</b> A City where housing production and preservation result in an adequate supply of ownership and rental housing that is safe, healthy, sanitary and affordable to people of all income levels, races, ages, and suitable to their various needs.	<b>Compatible:</b> Goal 1 is essentially the same as in the 1998-2005 Housing Element, and therefore the discussion above with respect to Goal 1 in that Housing Element also applies to the 2006-2014 Housing Element. The preservation and regulatory procedural barriers objectives do not specifically apply to the Project.
<b>Goal 2:</b> A City in which housing helps to create safe, livable and sustainable neighborhoods.	<b>Compatible:</b> The Project includes formal security measures and private security staff, and informal crime-reduction design strategies, to help ensure a same residential environment. As a mixed-use, multiple-tenure type development that includes jobs and access to transit, and with its attention to environmental sustainability, the Project is consistent with all of the objectives in this goal.
<b>Goal 3:</b> A City where there are housing opportunities for all without discrimination.	<b>Compatible:</b> This goal does not specifically apply to the Project. However, the Applicant will comply with all Federal, State and local laws and regulations to avoid and prevent discrimination in access to housing. The Project would provide a range of housing opportunities across the household income spectrum, including a variety of new home ownership opportunities.
<b>Goal 4:</b> A City committed to ending and preventing homelessness.	<b>Not Applicable:</b> This goal does not specifically apply to the Project.
<hr/> <i>Source: HR&amp;A, Inc., 2010.</i>	

part of the County. In addition, the Project would include community facilities that would be accessible to all users, consistent with applicable federal and state fair housing laws

The Project is compared to specific goals of the County's 1998-2005 Housing Element in Table 194 on page 2076. A comparable analysis with regard to the County's 2008-2014 Housing Element is presented in Table 195 on page 2078.

*(b) Conclusion*

The Project's proposed 2,937 dwelling units would provide about one percent of the growth in SCAG's household forecast for the City of Los Angeles Subregion between 2008 and 2030. This would occur without the displacement of any existing households and without the demolition of any existing rent-stabilized housing. The Project also represents about 10 percent of the households forecasted for the Southeast San Fernando Valley between 2008 and 2030, according to SCAG's regional growth forecast.

**Table 194**  
**Comparison of the Project to the Applicable Housing Goals of the**  
**County of Los Angeles General Plan Housing Element (1998-2005)**

General Plan Goals	Analysis of Project Consistency
<p><b>Goal 1:</b> A wide range of housing types in sufficient quantity to meet the needs of current and future residents, particularly persons and households with special needs, including but not limited to lower-income households, senior citizens, and the homeless.</p>	<p><b>Compatible:</b> The Project's 2,937 new multi-family units would contribute to the County's overall regional need for housing to accommodate existing and future households. In the event the proposed annexation does not occur, approximately 1,759 units would be located in the County. About 60 percent of the Project's new dwelling units would be condominiums and townhomes and about 40 percent would be rentals. As noted above, although the Project's specific unit pricing has not been established at this time, the Applicant is considering providing a range of housing opportunities including work force housing. This may not, however, accommodate lower income households and the homeless.</p>
<p><b>Goal 2:</b> A housing supply that ranges broadly enough in price and rent to enable all households, regardless of income, to secure adequate housing.</p>	<p><b>Compatible:</b> About 60 percent of the Project's new dwelling units would be condominiums and townhomes and about 40 percent would be rentals.<sup>595</sup> Although the Project's specific unit pricing has not been established at this time, the Applicant is considering providing a range of housing opportunities including work force housing. This may not, however, accommodate lower income households.</p>
<p><b>Goal 3:</b> Neighborhoods that protect the health, safety, and welfare of the community, and that enhance public and private efforts to maintain, reinvest in, and upgrade the existing housing supply.</p>	<p><b>Compatible:</b> The Mixed-Use Residential Area is an entirely new development within the context of a Specific Plan that specifies a wide range of development and design standards governing both the private and public areas of the Site. The development standards established within the proposed Specific Plan would serve to protect the health, safety, and welfare of the community. The proposed residential development also represents a very substantial scale of private investment in this part of the County and would expand and upgrade the housing supply. The Project is therefore consistent with this goal.</p>
<p><b>Goal 4:</b> Accessibility to adequate housing, employment centers and availability of community services for all persons without discrimination in accordance with federal and state fair housing laws.</p>	<p><b>Compatible:</b> The Project's mix of housing and neighborhood-serving retail uses as well as proposed community facilities would be accessible to all users, consistent with applicable federal and state fair housing laws. The Project is therefore consistent with this goal.</p>
<p><b>Goal 5:</b> An adequate supply of housing preserved and maintained in sound condition, located within neighborhoods that are safe, decent and healthful, and absent of excessive noise.</p>	<p><b>Compatible:</b> The Mixed-Use Residential Area is an entirely new development within the context of a proposed Specific Plan that specifies a wide range of development and design standards governing both the private and public areas of the Site. Development in accordance with the standards set forth in the proposed Specific Plan would result in a safe,</p>

<sup>595</sup> This tenure type mix is for analytic purposes only. The actual tenure type mix would be in response to market conditions at the time of actual development.

**Table 194 (Continued)**  
**Comparison of the Project to the Applicable Housing Goals of the**  
**County of Los Angeles General Plan Housing Element (1998-2005)**

General Plan Goals	Analysis of Project Consistency
	decent and healthful environment. The Project is therefore consistent with this goal.
<b>Goal 6:</b> An ongoing planning and monitoring function focused on housing that promotes the provision of affordable housing, and ensures the long-term availability of developments that provide affordable housing.	<b>Not Applicable:</b> This goal and its related objectives are directed toward actions to be taken by the County itself, and therefore do not apply to the Project.
<hr/> <i>Source: HR&amp;A, Inc., 2010; Matrix Environmental, 2010.</i>	

To the extent that the Mixed-Use Residential Area is annexed into the City of Los Angeles, the Project would assist the City in meeting its fair share of regional housing need, improve subregional jobs-housing balance, provide new housing opportunities, and conform with new City policy supporting higher density, compact, infill housing development that adds to the City’s housing supply, while meeting other “smart growth” objectives. These same benefits would accrue to the County for the portion of the Mixed-Use Residential Area that would remain in the County if the annexation does not occur (i.e., the Project is also generally consistent with the goals and objectives in the County’s Housing Element). In addition, because the Project combines new housing with new jobs, it would not have a numerical impact on the ratio of jobs to households (i.e., “jobs-housing balance”) in SCAG’s City of Los Angeles Subregion.

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 job opportunities presented by the Project. Even assuming some new Project permanent employees would relocate their households closer to the Project Site to be closer to work, these households, plus those in the Project’s new dwelling units, would still fall within applicable forecasts of housing or household growth. Therefore, no indirect housing growth impacts are anticipated due to the jobs created by the Project.

With regard to whether the Project introduces unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan, the properties surrounding the Project Site are already developed with single-family and multi-family homes, and commercial uses. Roads planned for the Project are planned primarily for

**Table 195**  
**Comparison of the Project to the Applicable Housing Goals of the**  
**County of Los Angeles General Plan Housing Element (2008-2014)**

General Plan Goals	Analysis of Project Consistency
<p><b>Goal 1:</b> A wide range of housing types in sufficient supply to meet the needs of current and future residents, particularly persons with special needs, including but not limited to low income households, seniors, persons with disabilities, single-parent households, the homeless and at-risk homeless, and farmworkers.</p>	<p><b>Compatible:</b> Goal 1 is essentially the same as in the 1998-2005 County Housing Element, and therefore the discussion above with respect to Goal 1 in that Housing Element also applies to the 2008-2014 County Housing Element.</p>
<p><b>Goal 2:</b> Sustainable communities with access to employment opportunities, community facilities and services, and other amenities.</p>	<p><b>Compatible:</b> The Project involves preparation and approval of a proposed Specific Plan through which the Project's land uses, infrastructure and services will all be specified and coordinated. The design of the Mixed-Use Residential Area includes a range of unit types and neighborhood-serving retail, services and community facilities, which will be designed with attention to public safety and environmental sustainability. Moreover, the Project mixes entertainment, retail, office, studio, neighborhood- and community-serving retail, and other community facilities and housing. The Project is therefore consistent with this goal.</p>
<p><b>Goal 3:</b> A housing supply that ranges broadly in housing costs to enable all households, regardless of income, to secure adequate housing.</p>	<p><b>Compatible:</b> Goal 3 is essentially the same as Goal 2 in the 1998-2005 County Housing Element, and therefore the discussion above with respect to Goal 2 in that Housing Element also applies to the 2008-2014 County Housing Element.</p>
<p><b>Goal 4:</b> A housing delivery system that provides assistance to low and moderate income households and those with special needs.</p>	<p><b>Not Applicable:</b> This goal and its related policy are directed towards actions to be taken by the County itself, and therefore does not directly apply to the Project.</p>
<p><b>Goal 5:</b> Neighborhoods that protect the health, safety, and welfare of the community, and enhance public and private efforts in maintaining, reinvesting in, and upgrading the existing housing supply.</p>	<p><b>Compatible:</b> Goal 5 is essentially the same as Goal 3 in the 1998-2005 County Housing Element, and therefore the discussion above with respect to Goal 3 in that Housing Element also applies to the 2008-2014 County Housing Element.</p>
<p><b>Goal 6:</b> An adequate supply of housing preserved and maintained in sound condition, located within safe and decent neighborhoods.</p>	<p><b>Compatible:</b> Goal 6 is essentially the same as Goal 5 in the 1998-2005 County Housing Element, and therefore the discussion above with respect to Goal 5 in that Housing Element also applies to the 2008-2014 County Housing Element.</p>
<p><b>Goal 7:</b> An affordable housing stock that is maintained for its long-term availability to low and moderate income households and those with special needs.</p>	<p><b>Compatible:</b> Goal 7 is a new goal concerning preservation of existing affordable housing which does not apply to the Project because it does not include existing affordable housing units.</p>
<p><b>Goal 8:</b> Accessibility to adequate housing for all persons without discrimination in accordance with Federal and State fair housing laws.</p>	<p><b>Compatible:</b> Goal 8 is essentially the same as Goal 4 in the 1998-2005 County Housing Element, and therefore the discussion above with respect to Goal 4 in that Housing</p>

**Table 195 (Continued)**  
**Comparison of the Project to the Applicable Housing Goals of the**  
**County of Los Angeles General Plan Housing Element (2008-2014)**

General Plan Goals	Analysis of Project Consistency
	Element also applies to the 2008-2014 County Housing Element.
<b>Goal 9:</b> Planning for and monitoring the long-term affordability of sound, quality housing.	<b>Not Applicable:</b> Goal 9 is similar to Goal 6 in the 1998-2005 County Housing Element, and therefore the discussion above with respect to Goal 6 in that Housing Element also applies to the 2008-2014 County Housing Element.
<hr/> <i>Source: HR&amp;A, Inc., 2010; Matrix Environmental, 2010.</i>	

internal circulation and would not open any large undeveloped areas for new use. Similarly, utility and other infrastructure upgrades planned for the Project are intended primarily to meet Project-related need. The Project households’ demand for commercial goods and services are anticipated to be met by new retail, service, and other resources included as part of the Project or already located within proximity of the Project Site. No new development specifically to meet the Project’s scale of household or commercial demand would be needed. On the contrary, the Project’s new non-residential and residential uses would help support the viability of existing businesses in the Project vicinity. Therefore, the Project would not result in any significant adverse impacts in terms of this significance threshold.

Housing growth is anticipated, and is reflected, in forecasts by SCAG as well as the City and County of Los Angeles due to the increases in population and population anticipated to occur throughout the region over the next 20-25 years. It is possible that some or all of the housing units planned for the Project would be developed elsewhere in the County, even if the Project had not been proposed, in response to future population and employment growth. It is unlikely, however, that the number of units planned for the Project, if located elsewhere, would feature the same direct access to employment and regional transportation as would occur at the Project Site.

Conversely, the additional housing units planned for the Project Site represent a new source of housing supply at a location where housing was not previously contemplated, and this could cause some reduction in housing supply in adjacent areas. Considering the scale of future housing demand associated with the regional growth forecast, any such local shift in the location where future housing supply might be sited would not be expected to alter the overall demand-supply balance. On the contrary, the Project’s co-location of new jobs and housing in close proximity to the Universal City Metro Red Line station on Lankershim Boulevard could yield housing market benefits by helping

to achieve the environmental and other benefits of reducing vehicle miles traveled and associated air quality impacts of long-distance home-to-work commutes. Therefore, the Project would not result in any significant adverse impacts in terms of the extent to which growth would occur without implementation of the Project.

In conclusion, the Project would respond to, but satisfy only a portion of, the unmet housing demand, rather than inducing housing growth. The Project would help achieve the household growth forecast for the City of Los Angeles Subregion, and would be consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of vehicle miles traveled. For all these reasons, the Project's housing impacts would be beneficial rather than adverse and are thus less than significant.

### (3) Impacts Under No Annexation Scenario

As the Project's housing would not exceed SCAG's projections for the Subregion which includes the entire Project Site (including both the City and County components), the scale of housing impact relative to the regional forecast remains the same whether or not the proposed annexation/detachment actions occur and place the Mixed-Use Residential Area entirely within the City of Los Angeles.

If the portion of the proposed Mixed-Use Residential Area currently within the County is not annexed to the City and remains within the County, the Project's housing would be consistent with the County's Housing Element goals. Thus, impacts under the No Annexation scenario would be less than significant.

## 4. Cumulative Impacts

Table 196 on page 2081 shows the cumulative housing impact of direct Project households (i.e., from new dwelling units and an allowance for additional units generated by new employment demand) in combination with all other forecasted household growth for the City of Los Angeles Subregion between 2008 and 2030. The 2008-2030 forecasted household growth is used as a proxy for "related projects," because the housing impacts of individual developments that may actually occur between 2008 and 2030 cannot be reasonably foreseen over the period of Project buildout. Table 196 compares the resulting total of direct Project households and forecasted household growth with the number of households forecasted to exist in the Subregion in 2030.

Table 196 shows that: (1) Project households account for 0.19 percent of households in the Subregion in 2030; (2) the Project's households account for 1.08 percent of projected household growth in the Subregion between 2008 and 2030; and (3) cumulative households (i.e., Project households plus forecasted 2008-2030 household growth in the Subregion) represents 17.90 percent of the forecasted number of households

**Table 196**  
**Project Households Plus “Related Projects” Households Compared With the**  
**Adopted SCAG Households Forecast for the City of Los Angeles Subregion**

	<b>Housing</b>
SCAG City of Los Angeles Subregion Households, 2030	1,663,000
SCAG City of Los Angeles Subregion Household Growth, 2008 - 2030	294,530
Project Households	3,169
“Related Projects” Households	294,530
<b>Cumulative Households (Project + Related Projects Households)</b>	<b>297,699</b>
Project Households Share of Subregional Households, 2030	0.19%
Project Households Share of Subregional Households Growth 2008 - 2030	1.08%
Cumulative Households Share of Subregional Households, 2030	17.90%

*Source: HR&A, Inc., 2010.*

in the Subregion in 2030. Thus, the Project’s incremental housing effect is not “cumulatively considerable” within the meaning of CEQA, and hence its cumulative housing impact is less than significant.

## **5. Project Design Features and Mitigation Measures**

### **a. Project Design Features**

No project design features are proposed with regard to housing.

### **b. Mitigation Measures**

No mitigation measures are required as proposed Project impacts with regard to housing would be less than significant.

## **6. Level of Significance After Mitigation**

Neither, the Project nor the Project in combination with related projects would exceed SCAG’s housing forecasts for the City of Los Angeles Subregion. In addition, the Project would be consistent with adopted housing policies of the Regional Comprehensive Plan and Guide, the Los Angeles County General Plan and the City of Los Angeles General Plan Framework and General Plan Housing Elements. Therefore, the Project would not result in any significant and unavoidable Project environmental impacts with respect to housing.