
IV. ENVIRONMENTAL IMPACT ANALYSIS

L. POPULATION AND HOUSING

Information on population, housing, and employment for the City of Los Angeles was derived from the California Department of Finance, the Los Angeles Department of City Planning, and from the Southern California Association of Governments (SCAG). Existing planning documents, such as the City of Los Angeles General Plan and the West Los Angeles Community Plan are also referenced. Demographic projections from these documents as well as up-to-date forecasts from SCAG and the City of Los Angeles Department of City Planning are used.

ENVIRONMENTAL SETTING

As part of its comprehensive planning process for the Southern California region, SCAG has divided the region into 14 subregions. The project site is located within the City of Los Angeles Subregion, which includes all areas within the boundaries of the City of Los Angeles, the City of San Fernando, and a portion of unincorporated Los Angeles County.

The project site is located within the City of Los Angeles. The City of Los Angeles' General Plan Land Use Element consists of 35 community plans, and the project site is, thus, more specifically located within the West Los Angeles CPA.

The project site contains the former St. Regis Hotel, but no residential uses or corresponding residents.

Applicable Plans

Regional Comprehensive Plan and Guide

The Regional Comprehensive Plan and Guide (RCPG) was adopted in 1994 by the member agencies of SCAG to set broad goals for the Southern California region and identify strategies for agencies at all levels of government to use in guiding their decision-making. 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). As mentioned previously, the project site is located within the Los Angeles City Subregion.

The Growth Management and Housing Chapters of the RCPG are non-mandated and do not establish any requirements for local governments. However, SCAG is responsible for assisting cities and counties in fulfilling their statutory obligations to prepare and regularly update their General Plans. The Growth Management and Housing Chapters of the RCPG are intended to provide a broad picture of population, housing, and employment issues affecting the region to assist local governments in meeting this requirement. By providing a regional framework for local population, housing, and employment

strategies that are responsive to market area needs and State mandates, the Growth Management and Housing Chapters are major tools for coordinating local development strategies within Southern California. The chapters also include a set of principles and policies associated with improving the regional standard of living and quality of life and for increasing the supply of housing in the region, particularly housing that is affordable to low and moderate-income households.

City of Los Angeles General Plan

California State Planning and Zoning law requires every city and county to prepare and adopt a comprehensive general plan for the development in their respective jurisdictions. While there are seven mandatory elements for every general plan in the State, the housing element is deemed to have “preeminent importance”.¹ In fact, the housing element of a city’s general plan is the only element that is subject to approval by the State. This approval process occurs as part of the Regional Housing Needs Assessment (RHNA), which is conducted by the State Department of Housing and Community Development pursuant to Government Code Section 65584 in conjunction with the appropriate regional agency (in this case, SCAG). The RHNA process examines existing and projected population, housing, and economic characteristics to determine the need for housing in a given region, including both market rate and affordable housing. The RHNA process ensures that local governments share the responsibility for accommodating the housing needs of all economic levels.

West Los Angeles Community Plan

The project site is located in the West Los Angeles Community Plan area (CPA). The West Los Angeles Community Plan was adopted in 1999 as one of 35 community plans that comprise the City of Los Angeles’ General Plan Land Use Element. The CPA encompasses approximately 4,565 square miles and primarily contains low density, single-family residential land uses with a mix of multi-family residential, commercial, and industrial land uses.

The City estimates population and housing growth for each community within the City, including the community of West Los Angeles.

Population

According to the U.S. Census, the City of Los Angeles had a permanent population of approximately 3,694,820 persons in 2000.² By 2010, SCAG forecasts an increase to approximately 4,090,125 persons.³

¹ *Committee for Responsible Planning v. City of Indian Wells, 1989, 209 Cal.App3d 1005,1013.*

² *California Department of Finance, Official US Census Counts as of April 1, 2000 – Table 2: City/County Population and Housing Counts.*

³ *Southern California Association of Governments Regional Transportation Plan Forecast, 2004.*

This represents an increase of 395,305 persons, or an 11 percent increase, from the 2000 population estimate for the City of Los Angeles (see Table IV.L-1, Los Angeles Population Forecasts). Table V.L-1 provides population projections for the City of Los Angeles from 2000 to 2010.

According to the Los Angeles Department of City Planning, the population in West Los Angeles was approximately 71,944 in 2000.⁴ The Community population is estimated to reach 78,566 by 2010.⁵ This represents an increase of 6,622 persons, or a nine percent increase, from the 2000 population estimate for the West Los Angeles Community (see Table IV.L-1). Table V.L-1 provides population projections for the West Los Angeles Community from 2000 to 2010.

Table IV.L-1
Los Angeles Population Forecasts (2000-2010)

City/Community	Population		Percent Change 2000-2010
	2000	2010	
City of Los Angeles ^a	3,694,820 ^a	4,090,125 ^a	11%
West Los Angeles Community ^b	71,944 ^b	78,566 ^b	9%

^a Source: California Department of Finance 2000 & SCAG RTP Forecast 2004.
^b Source: City of Los Angeles, West Los Angeles Community Plan, July 27, 1999.

Housing

According to the U.S. Census, the City of Los Angeles had a housing count of approximately 1,337,706 housing units in 2000.⁶ By 2010, SCAG forecasts an increase to approximately 1,372,873 housing units. This represents an increase of 35,167 housing units, or a three percent increase from the 2000 housing estimate for the City of Los Angeles (see Table IV.L-2, Los Angeles Housing Forecasts).⁷ Table IV.L-2 provides housing projections for the City of Los Angeles from 2000 to 2010.

According to the Los Angeles Department of City Planning, the housing count in West Los Angeles was approximately 36,687 in 2000.⁸ The Community housing count is estimated to increase to 38,258 by

⁴ Los Angeles Department of City Planning, website: <http://cityplanning.lacity.org/>, July 26, 2005.

⁵ City of Los Angeles, West Los Angeles Community Plan, July 27, 1999.

⁶ California Department of Finance, Official US Census Counts as of April 1, 2000 – Table 2: City/County Population and Housing Counts.

⁷ Southern California Association of Governments Regional Transportation Plan Forecast, 2004.

⁸ Los Angeles Department of City Planning, <http://cityplanning.lacity.org/>, July 26, 2005.

2010.⁹ This represents an increase of 1,571 housing units, or a four percent increase, from the 2000 housing estimate for the West Los Angeles Community (see Table IV.L-2). Table V.L-2 provides housing projections for the West Los Angeles Community from 2000 to 2010.

Table IV.L-2
Los Angeles Housing Forecasts 2000-2010

City/Community	Housing		Percent Change 2000-2010
	2000	2010	
City of Los Angeles	1,337,706	1,372,873	3%
West Los Angeles Community	36,687	38,258	4%
^a Source: California Department of Finance 2000 & SCAG RTP Forecast 2004.			
^b Source: City of Los Angeles, West Los Angeles Community Plan, July 27, 1999.			

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, a project would have a significant impact on the environment if it would:

- (a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure);
- (b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere ; or
- (c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

Furthermore, as set forth in the City of Los Angeles Draft L.A. CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis, considering the following factors:

- (a) 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;

⁹ *Ibid.*

(b) Whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and

(c) The extent to which growth would occur without implementation of the project.

Project Impacts

Direct Growth

Population and Housing

The proposed project includes construction of 147 condominiums on 3.8 acres of previously developed land. According to the project applicant, approximately one person would occupy every bedroom in the proposed condominiums. As described in Section III, Project Description, of this Draft EIR, the proposed project would include 60 two-bedroom units, 76 three-bedroom units, and 11 four-bedroom units. Therefore, approximately 392 people would occupy the 147 condominiums (see Table IV.L-3, Proposed Project Residential Population).

Table IV.L-3
Proposed Project Residential Population

Bedrooms	Units	Population (persons)
2	60	120
3	76	228
4	11	44
Total	147	392
<i>Source: Avenue of the Stars, LLC, August 2005; and Christopher A. Joseph & Associates, August 2005.</i>		

As the project site is currently developed with non-residential uses, this increase in residential population represents a 100 percent increase in population and housing on the project site.¹⁰ The direct physical impacts resulting from this increase in population and housing are analyzed under each issue area throughout this Draft EIR (see Sections IV.A through IV.O).

The increase in residential population resulting from implementation of the proposed project (392 persons) is considered minimal, as it would represent approximately six percent of the anticipated population growth in West Los Angeles between 2000 and 2010. This would not be a substantial increase, because the addition of 392 persons would be within the population projection in the West Los

¹⁰ However, the total number of visitors (i.e., non-residents and non-employees) to the project site during the operation of the proposed project is anticipated to be less than that associated with the hotel. It is estimated that the average daily number of hotel guests was approximately 334 persons (297 rooms x 1.5 persons per room x 70% occupancy).

Angeles Community Plan. As a result, the development of the proposed project would not directly induce substantial residential population growth, and impacts relating to residential population would be less than significant.

The proposed project would add 147 housing units to the City's housing inventory. This increase represents four percent of projected housing growth within West Los Angeles between 2000 and 2010. This would not be a substantial increase, because the addition of 147 housing units to the Community's housing inventory would not exceed the projected growth rates for the Community. As a result, the development of the proposed project would not directly induce substantial housing growth, and impacts relating to housing would be less than significant.

Construction-Related Population and Housing Growth

Construction of the proposed project would result in increased employment opportunities during the project's construction period. However, the employment opportunities provided by the construction of the proposed project would not likely result in household relocation by construction workers to the vicinity of the project site for various reasons, including the following:

- Construction employment has no regular place of business. Rather, construction workers commute to job sites that may change several times a year;
- 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; and
- 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.

Additionally, construction workers would likely be drawn from the construction employment labor force already resident in the surrounding communities. It is not likely that construction workers would relocate their place of residence as a consequence of working on the proposed project. Since construction workers would not relocate to the area, such workers would not cause an increase population or housing.

Overall, the construction of the proposed project would have a less-than-significant direct impact on housing and population growth.

Indirect Growth

The proposed project would include up to 50,000 square feet of commercial land uses. This would include 7,000 square feet of restaurant uses and either (a) 27,000 square feet of resident-focused specialty retail uses or (b) 43,000 square feet of private membership facility uses. The proposed project would

generate job opportunities for approximately 80 employees onsite.¹¹ Considering the employment of the former hotel (282 jobs),¹² the implementation of the proposed project would be expected to result in the net decrease of 202 jobs ($80 - 282 = -202$). Based upon this net decrease in jobs, the proposed project would not indirectly result in the demand for any new housing units within West Los Angeles. As a result, the development of the proposed project would not indirectly induce substantial population or housing growth due to new employment opportunities, and the associated impact would be less than significant.

The proposed project would not require the extension of roadways and other infrastructure (e.g., water facilities, sewer facilities, electricity transmission lines, natural gas lines, etc.) into undeveloped areas (see Sections IV.F Energy Conservation, IV.M Public Services, IV.N Transportation and Traffic, and IV.O Utilities and Service Systems). Furthermore, the existing infrastructure in the project area would serve the proposed project. As a result, the development of the proposed project would not indirectly induce substantial growth as a result of the extension of infrastructure, and the associated impact would be less than significant.

Housing or Population Displacement

The project site is currently developed but does not contain any housing or people. The implementation of the proposed project would not displace any housing or people, necessitating the construction of replacement housing elsewhere. Therefore, no impacts with respect to housing or population displacement would occur.

CUMULATIVE IMPACTS

The geographic context for cumulative population and housing analysis entails the West Los Angeles Community area, thus, only those related projects planned for West Los Angeles are included in this cumulative discussion. Of the 66 related projects, seven are within the West Los Angeles CPA. The other 59 related projects are located within the City of Beverly Hills, the Westwood CPA, the Wilshire CPA, the Bel Air-Beverly Crest CPA, and the UCLA campus. As these 59 related projects are located outside the boundaries of the West Los Angeles Community, the population growth impacts associated with them would be addressed by the General Plan and/or Community Plan for each related project's respective area.

As such, for the purpose of a cumulative impact analysis for the proposed project, only the seven related projects located in West Los Angeles should be addressed. Of these seven related projects, five are non-residential (i.e., Related Project Nos. 45, 47, 48, 50, and 52) and two are residential (i.e., Related Project

¹¹ Telephone correspondence with The Related Companies, September 22, 2005.

¹² Ibid.

Nos. 23 and 49). Implementation of the proposed project in combination with the seven related projects identified within the CPA would contribute to population and employment growth in the project vicinity.

The commercial land uses that would be developed with implementation of the proposed project in combination with the related projects would concurrently increase the number of employees and their associated households in the area. The 2,556,412 square feet of commercial land uses that would be developed with the related projects in combination with the proposed project's reduction of 323,000 net square feet of commercial uses would yield a combined employee increase of 7,294 employees (see Table IV.L-4).

**Table IV.L-4
Cumulative Employment Increase**

No.	Proposed Land Use	Unit of Measure	Generation Factor ^a	Total Employment Generation (employees)
45	Studio expansion	360,000 sf	2.6954 employees/1,000 sf	970
47	Office	508,600 sf	3.4965 employees/1,000 sf	1,778
48	Retail	71,000 sf	2.2371 employees/1,000 sf	159
50	Office	791,000 sf	3.4965 employees/1,000 sf	2,766
52	Office	763,900 sf	3.4965 employees/1,000 sf	2,671
	Restaurant	32,023 sf	2.2371 employees/1,000 sf	72
	Retail	19,214 sf	2.2371 employees/1,000 sf	43
	Cultural	10,675 sf	3.4965 employees/1,000sf	37
Subtotal Related Projects		2,556,412 sf	N/A	7,496
Subtotal Proposed Project				-202
Cumulative Total (Related Projects + Proposed Project)				7,294
<i>Notes: sf = square feet</i>				
<i>^a Source: Los Angeles Unified School District, Commercial/Industrial Development School Fee Justification Study, September, 2002.</i>				

Based on an estimate of one new housing unit per new employee, the cumulative employment would indirectly result in 7,294 new residences within West Los Angeles. However, this would be a conservative estimate of new permanent residents and households, as new employment positions are often filled from the existing Community and extended City population and typically do not result in relocation into the area to be closer to the place or work. As a result, development of the proposed project would not indirectly induce substantial cumulative population and housing growth as a result of new employment opportunities, and the associated cumulative impact would be less than significant.

The housing units that would be developed with the implementation of the proposed project in combination with the related projects within the CPA would concurrently increase the resident population in the area. The 492 dwelling units that would be developed with the related projects in combination with the proposed project's 147 dwelling units would yield a combined population increase of 1,322 persons (see Table IV.L-5). This cumulative addition of 1,322 new people would be within the West Los Angeles CPA's forecasted increase of 6,622 people between 2000 and 2010. This cumulative population increase would represent 20 percent of the forecasted population increase between 2000 and 2010 within the West Los Angeles CPA.

**Table IV.L-5
Cumulative Residential Population Increase**

No.	Proposed Land Use	Unit of Measure	Generation Factor ^a	Total Population Generation (persons)
23	Condominiums	9 du	1.89 person/du	17
49	Condominiums	483 du	1.89 persons/du	913
Subtotal Related Projects		492 du	N/A	930
Subtotal Proposed Project				392
Cumulative Total (Related Projects + Proposed Project)				1,322
<i>Notes: du = dwelling unit</i>				
<i>^a Source: City of Los Angeles, West Los Angeles Community Plan, July 27, 1999. As none of the Related Projects include low-density residential uses, the highest estimated person-per-dwelling unit generation factor (1.89 persons per dwelling unit) among low medium, medium, and high medium residential densities was utilized for this calculation. Thus, utilizing the West Los Angeles Community Plan estimated low medium-density residential generation factor of 1.89 persons, the 492 housing units associated with the Related Projects would generate a Related Projects population increase of 930 persons.</i>				

The cumulative addition of 639 housing units (492 related projects housing units + 147 proposed project housing units = 639 cumulative housing units) would also be within the West Los Angeles CPA's forecasted increase of 1,571 housing units between 2000 and 2010. This increase would represent 41 percent of the forecasted housing increase between 2000 and 2010 within the West Los Angeles CPA.

Based on the foregoing, the proposed project in combination with the related projects would not result in a significant impact on population or housing because:

- The number of people and homes that would be generated by the proposed project in combination with the related projects is within current West Los Angeles Community Plan population and housing forecasts;
- Roadways and other infrastructure are not anticipated to be extended into previously undeveloped areas that would be available for future development; and
- The proposed project would not result in or contribute to the displacement of housing or people.

Therefore, the proposed project's incremental contribution to cumulative population and housing growth would not be considerable, and cumulative impacts associated with population and housing would be less than significant.

MITIGATION MEASURES

The proposed project would have a less-than-significant impact with respect to population and housing; therefore, no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed project would have a less-than-significant impact with respect to population and housing.