I. Executive Summary

I. Executive Summary

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15123, this section of this Draft Environmental Impact Report (EIR) contains a brief summary of the Sunset Gower Studios Enhancement Plan (Project) and its potential environmental effects. More detailed information regarding the Project and its potential environmental effects is provided in the following sections of this Draft EIR. Also included herein is an overview of the purpose, focus and organization of this Draft EIR, a general description of areas of controversy, a description of the public review process for this Draft EIR, and a summary of the alternatives to the Project evaluated in this Draft EIR.

1. Purpose of this Draft EIR

As described in Section 15123(a) and 15362 of the CEQA Guidelines, an EIR is an informational document that will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. Therefore, the purpose of this Draft EIR is to focus the discussion on the Project's potential environmental effects that the City of Los Angeles (City), as the Lead Agency, has determined to be, or potentially may be significant. Feasible mitigation measures are recommended, when applicable, that could reduce or avoid the Project's significant environmental impacts.

This Draft EIR serves as the environmental document for all actions associated with the Project. This EIR is a "Project EIR" as defined by Section 15161 of the CEQA Guidelines. Furthermore, this Draft EIR complies with Section 15064 of the CEQA Guidelines which discusses determining the significance of the environmental effects caused by a project.

2. Draft EIR Focus and Effects Found Not to Be Significant

In accordance with Section 15128 of the CEQA Guidelines, an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the Draft EIR. An Initial Study was prepared for the Project and a Notice of Preparation (NOP) was distributed for public comment to the State Clearinghouse, Governor's Office of Planning and Research,

responsible agencies, and other interested parties on February 26, 2018 for a 30-day review period. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City determined through the Initial Study the potential for significant impacts in the following environmental issue areas:[1]

- Air Quality
- Cultural Resources
- Energy
- Geology and Soils (Paleontological Resources)
- Greenhouse Gas Emissions
- Land Use Planning
- Noise
- Public Services (including fire protection and police protection)
- Transportation
- Tribal Cultural ResourcesUtilities and Service Systems (including water supply and infrastructure, wastewater, and energy infrastructure)

The City determined through the Initial Study that the Project would not have the potential to cause significant impacts related to scenic vistas; scenic resources; light/glare; agricultural and forestry resources; objectionable odors; biological resources; geology and soils; hazards and hazardous materials; hydrology and water quality; physical division of an established community; conflict with an adopted habitat conservation plan or natural community conservation plan; mineral resources; airport or airstrip-related noise; population and housing; public services (including schools, parks and libraries); and recreation; changes in air traffic patterns; hazardous design features; construction or expansion of wastewater treatment facilities; construction or expansion of storm water drainage facilities; compliance with federal, state, and local statutes related to solid waste. Therefore, these areas were not analyzed in this Draft EIR. The Initial Study demonstrating

[1] *At the time the NOP was issued, the Appendix G checklist did not include the topic of telecommunication facilities or the threshold addressing wildfires. Refer to Section 4, Thresholds of Significance, below for further details on the December 2018 updates to Appendix G.*

that no significant impacts would occur for these issue areas is included in Appendix A of this Draft EIR.

3. Draft EIR Organization

This Draft EIR is comprised of the following sections:

I. Executive Summary. This section describes the purpose of this Draft EIR, Draft EIR focus and effects found not to be significant, Draft EIR organization, Project summary, areas of controversy and issues to be resolved, public review process, summary of alternatives, and a summary of environmental impacts and mitigation measures.

II. Project Description. This section describes the Project location, existing conditions, Project objectives, and characteristics of the Project.

III. Environmental Setting. This section contains a description of the existing physical and built environment and a list of related projects anticipated to be built in the vicinity of the Project Site.

IV. Environmental Impact Analysis. This section contains the environmental setting, Project and cumulative impact analyses, mitigation measures (where necessary), and conclusions regarding the level of significance after mitigation for each of the following environmental issues: aesthetics; air quality; cultural resources; energy; paleontological resources; greenhouse gas emissions; land use and planning; noise; public services (fire protection and police protection); transportation; tribal cultural resources; utilities and service systems (water supply and infrastructure, wastewater; and energy infrastructure).

V. Alternatives. This section provides an analysis of a reasonable range of alternatives to the Project including: No Project/No Build Alternative; Preservation and Soundstage Alternative; Reduced Excavation Alternative; and Reduced Intensity Alternative.

VI. Other CEQA Considerations. This section provides a discussion of significant unavoidable impacts that would result from the Project and the reasons why the Project is being proposed notwithstanding the significant unavoidable impacts. An analysis of the significant irreversible changes in the environment and potential secondary effects that would result from the Project is also presented here. This section also analyzes potential growth-inducing impacts of the Project and potential secondary effects caused by the implementation of the mitigation measures for the Project. Lastly, a summary

of the possible effects of the Project that were determined not to be significant within the Initial Study is provided.

VII. References. This section lists the references and sources used in the preparation of this Draft EIR.

VIII. Acronyms and Abbreviations. This section provides a list of acronyms and abbreviations used in this Draft EIR.

IX. List of Preparers. This section lists the persons, public agencies, and organizations that were consulted or contributed to the preparation of this Draft EIR.

This Draft EIR includes the environmental analysis prepared for the Project and appendices as follows:

- Appendix A—Initial Study, NOP (Notice of Preparation), and NOP Comment Letters
  - Appendix A.1—Initial Study
  - Appendix A.2—Notice of Preparation (NOP)
  - Appendix A.3—NOP Comment Letters
- Appendix B—Technical Appendix for Air Quality and Greenhouse Gas Emissions
- Appendix C—Cultural Resources
  - Appendix C.1— Historical Resources Technical Report
  - Appendix C.2— Archaeological Resources Records Search
- Appendix D— Energy Calculations
- Appendix E— Paleontological Resources Records Search
- Appendix F— Land Use Consistency Tables
- Appendix G—Noise Calculation Worksheets
- Appendix H—LAFD Letter
- Appendix I—LAPD Letter

- Appendix J—Transportation Study
  - Appendix J.1— CEQA Analysis Memo
  - Appendix J.2— LADOT's Assessment Letter (CEQA Analysis)
  - Appendix J.3— Transportation Impact Study
  - Appendix J.4— LADOT's Assessment Letter (Transportation Impact Study)
  - Appendix J.5— VMT Memo for Project Alternatives
- Appendix K—Tribal Cultural Resources
  - Appendix K.1— Tribal Cultural Resources Report
  - Appendix K.2— AB 52 Notification Letters and Delivery Confirmations
  - Appendix K.3— AB 52 Consultation Cancellation
- Appendix L— Utilities and Service Systems
  - Appendix L.1— Water Supply Assessment
  - Appendix L.2— Utility Report

4. Revisions to State CEQA Guidelines Appendix G

In January 2018, the Office of Planning and Research proposed comprehensive updates to the CEQA Guidelines which revised thresholds for aesthetics, air quality, cultural resources, geology and soils, hydrology and water quality, land use and planning, noise, population and housing, transportation, and utilities and service systems and included additional thresholds to address wildfires. This Draft EIR considers the revised thresholds for the environmental topics addressed herein in Section IV, Environmental Impact Analysis. In addition, the new topic of telecommunications facilities added to the revised thresholds for utilities and service systems as well as the new thresholds addressing wildfires are addressed in Section VI, Other CEQA, of this Draft EIR.

5. Existing Project Site Conditions

The Project Site is an existing major motion picture and television studio. Existing development within the Project Site includes 378,978 square feet of creative office space, 56,050 square feet of production support, 175,058 square feet of sound stages, and 6,516 square feet of restaurant space, which together comprise 616,602 square feet of

floor area, not including 1,400 square feet of service areas. The Project Site also includes three parking structures providing a total of 1,398 parking spaces.

Vehicular access to the Project Site is provided along Sunset Boulevard at North Beachwood Drive and along Gordon Street. Both access points have 24-hour security and gates. Emergency and limited vehicular access is provided along Fountain Avenue. Limited pedestrian access is also provided along Gower Street through a gated entry and pedestrians can also enter the Project Site through a secure gate off of Sunset Boulevard.

The Project Site contains limited to sparse landscaping in the form of non-native/ non-protected trees,[2] hedges, and shrubs. The Project Site is enclosed with restricted access and on-site security, with access limited to the tenants and their guests. The Project Site is located within the Hollywood Community Plan Area and it has a Limited Manufacturing General Plan land use designation. The Project Site is zoned M1-1 (Limited Industrial, Height District 1), which permits MR1 uses (Restricted Industrial), limited industrial and manufacturing uses, any enclosed C2 uses, wireless telecommunications, and household storage. Studio production and office uses are a permitted use in the MR1 Zone. As such, they are also permitted in the M1 Zone. Height District 1 within the M1 Zone has no height limit but restricts the maximum Floor Area Ratio (FAR) to 1.5:1. The Project Site is located in a Transit Priority Area, as defined by Zoning Information File 2452.[3]

6. Description of the Proposed Project

a. Project Overview

The proposed Project's studio-related creative office, production office/production support and storage uses would be provided within three new buildings (referred to herein as Buildings A, B, and C). To build the proposed improvements, the Project would demolish 160,611 square feet of existing floor area, including 125,521 square feet of creative office floor area, 29,444 square feet of production support floor area, and 5,646 square feet of sound stage floor area, Overall, the Project would remove 160,611 square feet of existing floor area and develop 627,957 square feet of floor area, resulting in a net increase of approximately 467,346 square feet of floor area. When averaged across the 15.9-acre portion of the Project Site on which improvements are

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[2] *The City of Los Angeles Protected Tree Regulations apply to Oak, Southern California Black Walnut, Western Sycamore, and California Bay tree species that are native to Southern California, and excludes trees grown by a nursery or trees planted or grown as part of a tree planting program.*

[3] *The City's Zone Information and Map Access System (ZIMAS) confirms the Project Site's location within a Transit Priority Area, as defined in the City's Zoning Information File No. 2452.*

proposed, the 15.9-acre portion of the Project Site would have a FAR of 1.47:1, which would be below the existing FAR limitation of 1.5:1.[4]

Building A would be located along Sunset Boulevard, and Buildings B and C would be centrally located within the Project Site. Building A would contain approximately 478,851 square feet of creative office space, comprising 18 stories with a height of 300 feet. Three levels of subterranean parking would be provided in Building A. The overall mass of Building A would feature discrete volumes, thereby reducing its scale and enhancing its visual interest on the street and in the larger urban context. Further, the design would be distinguished by landscaped outdoor decks and recessed terraces providing both outdoor space and shaded areas. In addition, the design would include varied glass profiles as well as a high level of architectural detailing that pays homage to the historic structures on the studio lot.

Building B would contain approximately 68,600 square feet of creative office and production support space, comprising five stories with a height of approximately 89 feet. Building C would contain approximately 79,000 square feet of creative office and production support space, comprising six stories with a height of approximately 89 feet. The design of Buildings B and C would incorporate historic elements into a modern style to complement Building A. Buildings B and C would feature varying façade planes articulated by steel-frame windows, curtain walls, exposed black steel beams, textured concrete, and polycarbonate panels. Buildings B and C would also be distinguished by distinctive massing and landscaped terraces along with a palette of materials (i.e., steel I-breams and metal sash windows) which link the design to the traditions of film studios.

The Project would also include landscaped courtyards and walkways to connect the proposed buildings, new street trees, and the addition of architectural treatments to the existing parking structures along Gordon Street.

Three buildings on the Project Site could individually be eligible for historic status. The Project proposes to retain two of these: the building at 1440 Gower Street and the building at 1455 Gordon Street. The third building, at 6050 Sunset Boulevard, would be demolished. The Project Site also contains buildings that, while not individually eligible for historic status, could comprise a collection of buildings that constitute a historic district as a result of their definable association with the motion picture industry in Los Angeles. Because there are potential historical resources on the Project Site, a Historic Resources Plan would be prepared and implemented as part of the Project to guide the preservation of

[4] *The Project's FAR is calculated based on the 15.9-acre portion of the Project where improvements are proposed, which is the only portion of the Project Site owned by the Applicant, and the portion of the Project Site to which the conditional use permit for floor area averaging is being sought.*

a majority of the Project Site's historical resources, as well as construction of new structures. The Historic Resources Plan would include detailed guidelines for the rehabilitation and preservation of most of the existing buildings that contribute to a potential Historic Studio District following Project development.

b. Access, Circulation, and Parking

Existing vehicular access to the Project Site would be maintained and provided via existing driveways along Sunset Boulevard and Gordon Street. In addition, pedestrian-only access to the Site would also continue to be provided along Gower Street and through the Sunset Boulevard gate.

The Project would provide parking consistent with LAMC and would provide up to 1,335 new parking spaces, comprised of (1) up to 525 spaces within a new parking structure with six above-grade levels and three subterranean parking levels; (2) up to 531 spaces within three subterranean parking levels below the existing basecamp and below a proposed 1,450-square-foot bicycle parking facility; and (3) up to 279 spaces within three subterranean levels below Building A. The proposed subterranean parking levels would extend to a maximum depth of 42 feet. The Project would comply with City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the new parking facilities. In addition, in accordance with the requirements of the LAMC, approximately 284 bicycle parking spaces consisting of 102 short-term spaces and 182 long-term spaces (within the 1,450-square-foot bicycle parking facility) would be provided.

c. Internal Landscaped Areas

The landscape plan would create a variety of landscaped gathering areas to enhance the existing pedestrian environment internal to the Site, including a paseo, a central plaza area, courtyards, and roof gardens and terraces. These areas would include trees, accent paving, seating, and other landscaping features throughout the Project Site.

d. Lighting and Signage

The Project would include low-level exterior lights adjacent to the proposed buildings and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the Project Site. Project lighting would be designed to provide efficient and effective on-site lighting while minimizing light trespass from the Project Site, reducing skyglow, and improving nighttime visibility through glare reduction.

Specifically, all on-site exterior lighting would be automatically controlled via photo sensors to illuminate only when required and would be shielded or directed toward areas to be illuminated to limit spill-over onto nearby residential uses. Where appropriate, interior lighting would be equipped with occupancy sensors and/or timers that would automatically extinguish lights when no one is present. All exterior and interior lighting shall meet high energy efficiency requirements utilizing light-emitting diode (LED) or efficient fluorescent lighting technology.

Proposed signage would be designed to be aesthetically compatible with the existing and proposed architecture of the Project Site and would be architecturally integrated into the design of the proposed buildings as well as establish appropriate identification for the proposed uses. Proposed signage would include identity signage, building and tenant signage, and general ground level and way-finding pedestrian signage. No off premises or billboard advertising is proposed as part of the Project. The Project would not include signage with flashing, mechanical, or strobe lights. Project signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off-site glare. Illumination used for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

e. Project Sustainability

The Project would be constructed to incorporate environmentally sustainable design features required by the Los Angeles Green Building Code and the sustainability intent of the U.S. Green Building Council's Leadership in Energy Efficiency and Design (LEED) green building program to achieve LEED Silver certification or equivalency. LEED standards would be incorporated to reduce energy and water usage and waste, thereby reducing associated greenhouse gas emissions. Proposed features to support and promote environmental sustainability include Energy Star appliances; reduced indoor water use by at least 20 percent; plumbing fixtures (water closets and urinals) and fittings (faucets) that exceed the performance requirements specified in the Los Angeles Municipal Code; weather-based irrigation system; and water-efficient landscaping with use of drought tolerant plants in up to 60 percent of the proposed landscaping. The Project would also utilize sustainable building strategies and would incorporate the use of environmentally friendly materials, such as non-toxic paints and recycled finish materials wherever possible. Lastly, the Project would comply with City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the new parking facilities.

7. Anticipated Construction Schedule

The timing of construction of specific elements of the Project would depend on the business needs at the time. Project construction could occur in phases, with buildout expected to be completed by 2028. Construction activities would include demolition of existing uses, grading and excavation, and construction of new structures and related infrastructure. Construction of Building A and Parking Structure would require approximately 39 months, construction of the subterranean parking structure would require approximately 15 months, and construction of Buildings B and C would require approximately 18 months. Approximately 280,000 cubic yards of soil would be hauled from the Project Site during the excavation phase.

8. Necessary Approvals

The discretionary entitlements, reviews, permits and approvals required to implement the Project may include, but are not limited to, the following:

- Pursuant to LAMC Sections 12.24 T.3(b) and 12.24 U.14, a Vesting Conditional Use Permit for a Major Development Project;
- Pursuant to LAMC Section 12.24 W.19, a Conditional Use Permit to allow Floor Area Ratio Averaging in Unified Developments;
- Pursuant to LAMC Sections 12.22 A.23, 12.24 W.27, and 12.24 F a Conditional Use Permit for a Commercial Corner Development;
- Pursuant to LAMC Section 16.05, Site Plan Review to for a development project which results in an increase of 50,000 gross square feet of non-residential floor area;
- Pursuant to LAMC Section 17.15, Vesting Tentative Tract Map No. 80310 for merger and subdivision purposes; and
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including but not limited to; additional necessary entitlements, clearance related to the Hollywood Redevelopment Plan, temporary street closures, demolition permits, grading permits, excavation permits, foundation permits, street tree removal permits, and building permits.

9. Areas of Controversy

Based on the NOP comment letters provided in Appendix A of this Draft EIR, issues known to be of concern included, but were not limited to, Project impacts on aesthetics; air quality; cultural resources; greenhouse gas emissions; land use; recreation; transportation;

tribal cultural resources; and utilities and service systems. Refer to Appendix A of this Draft EIR for copies of the NOP comment letters.

10. Public Review Process

The City prepared an Initial Study and circulated an NOP for public comment to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties on February 26, 2018, for a 30-day review period. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft EIR.

This Draft EIR is being circulated for a 45-day public comment period. Following the public comment period, a Final EIR will be prepared that will include responses to the comments raised regarding this Draft EIR.

11. Summary of Environmental Impacts

Table I-1 on page I-12 provides a summary of the environmental impacts of the Project evaluated in this Draft EIR. These impacts are summarized as follows:

Table I-1
Summary of Impacts Under the Project

Environmental Issue	Proposed Project Impact
A. AESTHETICS	
Conflict with Applicable Regulations Governing Scenic Quality	Less Than Significant
Visual Character	
Construction	Less Than Significant
Operation	Less Than Significant
B. AIR QUALITY	
Construction	
Regional Emissions[a]	**Significant and Unavoidable**
Localized Emissions	Less Than Significant
Toxic Air Contaminants	Less Than Significant
Operation	
Regional Emissions	Less Than Significant
Localized Emissions	Less Than Significant
Toxic Air Contaminants	Less Than Significant
C. Cultural Resources	
Historical Resources	**Significant and Unavoidable**
Archaeological Resources	Less Than Significant with Mitigation
Human Remains	Less Than Significant
D. ENERGY	
Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources	
Construction	Less Than Significant
Operation	Less Than Significant
Conflict with Plans for Renewable Energy or Energy Efficiency	Less Than Significant
E. GEOLOGY AND SOILS (PALEONTOLOGICAL RESOURCES)	Less Than Significant with Mitigation
F. GREENHOUSE GAS EMISSIONS	Less Than Significant
G. LAND USE	
Land Use Consistency	Less Than Significant
H. NOISE	
Construction	
On-Site Noise	**Significant and Unavoidable**
Off-Site Noise[b]	**Significant and Unavoidable**
On-Site Vibration (Building Damage)	Less Than Significant with Mitigation
On-Site Vibration (Human Annoyance)	**Significant and Unavoidable**
Off-Site Vibration (Building Damage)	Less Than Significant
Off-Site Vibration (Human Annoyance)	Less Than Significant

Table I-1 (Continued)
Summary of Impacts Under the Project

Environmental Issue	Proposed Project Impact
Operation	Less Than Significant
I. PUBLIC SERVICES	
Fire Protection	
Construction	Less Than Significant
Operation	Less Than Significant
Police Protection	
Construction	Less Than Significant
Operation	Less Than Significant
J. TRANSPORTATION	
Conflict with Plans	Less Than Significant
Vehicle Miles Traveled	Less Than Significant
Hazardous Design Features	Less Than Significant
Emergency Access	Less Than Significant
K. TRIBAL CULTURAL RESOURCES	No Impact
L. UTILITIES AND SERVICE SYSTEMS	
Water Supply and Infrastructure	
Construction	Less Than Significant
Operation	Less Than Significant
Wastewater	
Construction	Less Than Significant
Operation	Less Than Significant
Energy Infrastructure	
Construction	Less Than Significant
Operation	Less Than Significant

[a] *As discussed in Section IV.B, Air Quality, of this Draft EIR, cumulative impacts from regional emissions during construction would be significant and unavoidable.*

[b] *As discussed in Section IV.B, Air Quality, of this Draft EIR, cumulative impacts from regional emissions during construction would be significant and unavoidable.*

Source: Eyestone Environmental, 2020.

a. Less Than Significant

(1) Aesthetics

As discussed in Section IV.A, Aesthetics, of this Draft EIR, pursuant to SB 743 and ZI 2452, Project impacts related to aesthetics (visual character, views, light and glare, and

shading) would not be considered significant. Nonetheless, an analysis is provided for informational purposes.

(a) Conflict with Regulations Governing Scenic Quality

(i) General Plan Framework Element

As discussed in Section IV.A, Aesthetic Resources, of this Draft EIR, the Project would enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm. Specifically, the proposed buildings would be designed in a contemporary architectural style that would be compatible with the general urban characteristics of the surrounding neighborhood while enhancing the on-site functionality. The proposed buildings would be moderated by a high degree of articulation, using both variations in building planes and façade setbacks, as well as a variety of materials, and would be designed to respond to the neighborhood fabric and would integrate a human scale and pedestrian interest through the use of integrated architectural design and landscape elements. Furthermore, the Project design would complement the varying design elements of both the commercial and residential uses adjacent to the Project Site. Therefore, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the General Plan Framework Element's Urban Form and Neighborhood Design Chapter.

(ii) General Plan Conservation Element

As discussed in Section IV.C, Cultural Resources, of this Draft EIR, the Sunset Gower Studios includes a potential Historic District as well as individual historic buildings. The potential historic district would continue to retain a concentration of buildings that date from the period of significance and reflect the historic identity of Columbia Studios as a "Big Eight" motion picture studio operating during the Major Studio Era. However, demolition of the United Recording building at 6050 Sunset Boulevard would result in significant impacts to a historic resource. Therefore, the Project would only partially conflict with the primary objective and policy regarding the protection of cultural and historic resources set forth in the Conservation Element. The Project would not conflict with other objectives and policies in the Conservation Element regarding obstruction of existing scenic vistas or public views of visual resources.

(iii) Hollywood Community Plan

The Project would expand upon the existing uses in Hollywood by introducing additional studio/media/entertainment-related office and production support space on a site traditionally occupied by studio-related uses. As such, the Project would support the, the Project would support the City's objectives to perpetuate its image as the international center of the motion picture industry. Additionally, new power lines would be placed

underground, which is consistent with the public improvements section of the Hollywood Community Plan.

(iv) Hollywood Redevelopment Plan

The Project would enhance the built environment in the surrounding neighborhood and upgrade the quality of development. Specifically, the proposed buildings would be designed in a contemporary architectural style that would be compatible with the general urban characteristics of the surrounding neighborhood while enhancing the on-site functionality. The proposed buildings would be moderated by a high degree of articulation, using both variations in building planes and façade setbacks, as well as a variety of materials, and would be designed to respond to the neighborhood fabric and would integrate a human scale and pedestrian interest through the use of integrated architectural design and landscape elements. In addition, the Project would develop a variety of landscaped gathering areas to enhance the existing pedestrian environment internal to the Project Site, including a paseo, a central plaza area, courtyards, and roof gardens and terraces. Furthermore, the Project would also implement several safety features such as an enhanced closed circuit camera system and keycard or guarded entry. In addition, proper lighting of buildings and walkways would be incorporated to maximize visibility and provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings; parking areas would also be lit to maximize visibility and reduce areas of concealments; and entrances to, and exits from buildings, would be designed to be open and in view of surrounding sites. Overall, the Project would support the Redevelopment Plan's goal to improve the quality of the environment.

(v) Citywide Urban Design Guidelines

The Citywide Design Guidelines are intended as performance goals and not zoning regulations or development standards. However, not all the Citywide Design Guidelines will be appropriate in every case. In the case of the Project, it would not conflict with the six objectives of the Citywide Design Guidelines for commercial uses. The Project would preserve studio-related uses and would not allow for intrusion of other uses. In addition, the Project would include a high level of architectural detailing that pays homage to the historic structures on the studio lot. The Project would feature varying façade planes articulated by steel-frame windows, curtain walls, exposed black steel beams, textured concrete, and polycarbonate panels. The Project would also be designed to be non-intrusive to on-site users by locating loading and trash facilities away from pedestrian areas. Furthermore, the Project would also provide a variety of landscaped gathering areas to enhance the existing pedestrian environment internal to the Project Site, including a paseo, a central plaza area, courtyards, and roof gardens and terraces. Therefore, the Project would not conflict with the six objectives of the City Design Guidelines for commercial uses.

(vi) Walkability Checklist

The Walkability Checklist consists of a list of design elements intended to improve the pedestrian environment, protect neighborhood character, and promote high quality urban form. The Checklist addresses sidewalks; crosswalks/street crossings; on-street parking; utilities; building orientation; off-street parking and driveways; on-site landscaping; building façade; and building signage and lighting. The Project would incorporate, where applicable, the implementation strategies presented in the Walkability Checklist and relevant design elements to promote a visually appealing pedestrian environment. Specifically, the Project would not disrupt the existing continuous and predominantly straight sidewalks bounding the Project Site and would provide a landscaped buffer at the corner of Gordon Street and Fountain Avenue. The Project would also create a buffer between pedestrians and moving vehicles, provide adequate sidewalk widths, and incorporate closely planted shade-producing street trees. As discussed in Section IV.A, Aesthetics, of this Draft EIR, although the Project does not include crosswalks or street crossings, appropriate curbs would be provided to facilitate safe pedestrian movement, including pedestrian and bicycle access to the Project Site consistent with the objective regarding crosswalks street crossings. In addition, the Project would support the implementation strategies related to the undergrounding and screening of utilities. The Project would also maintain the existing main entrance along Sunset Boulevard, provide pedestrian access that is conveniently located near public transit stops adjacent to the Project Site, and comply with Americans with Disabilities Act (ADA) guidelines. Furthermore, the Project would create a variety of landscaped gathering areas to enhance the existing pedestrian environment internal to the Project Site, including a paseo, a central plaza area, courtyards, and roof gardens and terraces. Additionally, building signage and lighting would be designed to strengthen the pedestrian experience, neighborhood identity, and visual coherence. Therefore, the Project would not conflict with the applicable Walkability Checklist objectives and would implement relevant strategies.

(vii) LAMC

The proposed studio/media/entertainment-related office uses would be consistent with the existing zoning and would not represent a change in use for the Sunset Gower Studios. The Project would also be within the maximum FAR permitted for the Project Site. Specifically, the Project would remove 160,611 square feet of existing floor area and develop 627,957 square feet of floor area, resulting in a net increase of approximately 467,346 square feet of floor area. When averaged across the 15.9-acre portion of the Project Site for which entitlements are requested, the 15.9-acre portion of the Project Site

would have a FAR of 1.47:1, which would be below the existing FAR limitation of 1.5:1.[5] With respect to setback regulations, buildings erected and used exclusively for commercial or industrial purposes in the M1 zone do not require front, side, or rear yard setbacks. Therefore, the Project would not conflict with LAMC requirements.

(b) Visual Character or Quality of Site and Surroundings

(i) Construction

Construction activities cause a disruption to the aesthetic character of an area. Although temporary in nature, construction activities may cause a visually unappealing quality in a community. Construction of the Project would alter the visual character and quality of the Project Site due to the removal of the existing structures; site preparation, grading, and excavation; the staging of construction equipment and materials; and the construction of building foundations and proposed structures. However, the appearance of the Project Site during construction would be typical of construction sites in urban areas, and aside from vertical building construction, not substantially different than existing conditions. Furthermore, construction activities would be temporary in nature, and the visual impacts associated with construction activities would cease upon the completion of the Project's construction phase. In addition, the Project would implement several project design features to reduce visual impacts associated with construction activities.

The Project would also require the removal of ornamental trees within the Project Site, temporarily reducing the visual quality of the Project Site during construction. However, all existing trees subject to removal within the Project Site would be replaced on at least a 1:1 basis per City requirements. In addition, the Project would provide ample on-site landscaping to enhance the streetscape, including a landscaped paseo, a central plaza area, courtyards, and rooftop gardens and terraces. As such, the Project's removal of existing on-site trees and other construction activities would not substantially degrade the existing visual character or quality of the Project Site and surrounding area. Impacts related to aesthetics during construction would be less than significant.

(ii) Operation

As discussed in Section IV.A, Aesthetics, of this Draft EIR, the internal portion of the Project Site is generally not visible from the surrounding area. Limited street-level visual access to the Project Site is available at the driveway on Beachwood Drive located along Sunset Boulevard. In addition, the existing 6050 Sunset Boulevard building is considered a

[5] *The Project's FAR is calculated based on the 15.9-acre portion of the Project where new buildings are proposed and across which the floor area is being averaged, which is the only portion of the Project Site owned by the Applicant, and the portion of the Project Site to which the entitlements are being sought.*

historic resource, which may contribute to the visual character of the area. Nevertheless, as concluded in Section IV.A, Aesthetics, the demolition of the 6050 Sunset Boulevard building would not result in the loss of a unique visual resource and would not substantially degrade the visual character or quality of the Project Site and its surroundings. Overall, development of the Project's buildings and associated landscaping would allow for the integration of the Project Site, providing a visually unified space while modernizing and improving the functionality of the studio.

With regard to the visual character of the surrounding uses, the Project design would complement the varying design elements of both the commercial and residential uses adjacent to the Project Site. Specifically, as described above, the tallest proposed structure would be located along Sunset Boulevard, where it would be compatible in scale to several buildings along, and north of, Sunset Boulevard. With regard to massing, the Project would result in greater density and scale of development at the Project Site when compared with existing conditions. However, the Project would provide infill development within a dense urban setting that would be consistent in scale and height with development occurring along Sunset Boulevard, where the majority of the Project's new development will be focused. Furthermore, the design of each building would incorporate ground-level design elements, including transparent windows and a variety of exterior textures and finishes that would enhance the pedestrian environment.

Based on the above, the Project would not substantially degrade the existing visual character or quality of the site and its surroundings; thus, the Project's aesthetic impacts would not be considered significant.

(2) Air Quality

(a) Consistency with Applicable Air Quality Plans

(i) SCAQMD CEQA Air Quality Handbook Policy Analysis

The Project represents an infill development near transit within an existing urbanized area that would preserve and enhance most of the existing buildings on the Sunset Gower Studios and develop new studio-related creative office, production office/production support and storage uses within a High Quality Transit Areas (HQTA), thus reducing vehicle miles traveled (VMT). The Project would not exceed South Coast Air Quality Management District (SCAQMD)-recommended localized significance thresholds. In addition, the Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for pollutants. The Project would also not have a significant long-term impact on the region's ability to meet state and federal air quality standards. Furthermore, growth resulting from the Project would be consistent with the population, housing, and employment projections set forth in SCAG's 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which form the basis of

the Air Quality Management Plan's (AQMP) growth assumptions. In addition, the Project would implement Mitigation Measure AIR-MM-1, which requires the use of off-road diesel equipment that meets USEPA Tier 4 Final off-road emissions standards during peak periods of construction, where feasible. The Project also would incorporate project design features to support and promote environmental sustainability. Accordingly, the Project would not conflict with or obstruct implementation of the AQMP, and associated impacts would be less than significant.

(ii) City of Los Angeles Polices

As discussed in Section IV.B, Air Quality, of this Draft EIR, the Project would promote the City of Los Angeles General Plan Air Quality Element goals, objectives and policies. Specifically, the Project includes 284 bicycle parking spaces consisting of 102 short-term spaces and 182 long-term spaces. In addition, the Project would provide opportunities for the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in VMT. Moreover, the Project would be consistent with the existing land use pattern in the vicinity that concentrates urban density along major arterials and near transit options. The Project also includes primary entrances for pedestrians and bicyclists that would be safe, easily accessible, and a short distance from transit stops. Therefore, the Project would be consistent with applicable policies of the City of Los Angeles Air Quality Element.

(b) Air Emissions and Air Quality Standards

(i) Construction—Localized Impacts, CO Hotspots and TAC Impacts

As presented in Section IV.B, Air Quality, of this Draft EIR, maximum construction emissions would not exceed the SCAQMD-recommended localized screening thresholds (LSTs). As a result, Project-related construction activities would not expose sensitive receptors to substantial criteria pollutant concentrations, and construction of the Project would result in a less-than-significant impact with regard to localized emissions.

With regard to potential impacts associated with CO "Hot Spots," the Project's off-site construction activities, including the highest average daily trips, would not expose sensitive receptors to substantial CO concentrations. As a result, impacts related to localized construction mobile-source CO emissions are considered less than significant.

With regard to Toxic Air Contaminants (TAC) during construction, given the short-term construction schedule of approximately 5 years, the Project would not result in a long-term (i.e., 70-year) source of TAC emissions. Additionally, the SCAQMD CEQA guidance does not require a HRA for short-term construction emissions. It is, therefore, not necessary to evaluate long-term cancer impacts from construction activities which occur

over a relatively short duration. The Project construction activities, including generation of TACs, would not expose sensitive receptors to substantial pollutant concentrations. Project-related TAC impacts during construction would be less than significant**.**

(ii) Operation—Regional Emissions, Localized Emissions, CO Hotspots and TAC Impacts

As presented in Section IV.B, Air Quality, of this Draft EIR, emissions resulting from operation of the Project would not exceed the SCAQMD's daily regional operational thresholds. Regional operational impacts would be less than significant.

With regard to localized emissions, operation of the Project would not introduce any major new sources of air pollution within the Project Site. Emissions estimates for criteria air pollutants from on-site sources are presented in Section IV.B, Air Quality, of this Draft EIR. As demonstrated therein, on-site operational emissions would not exceed any of the LSTs. As such, Project operations would not expose sensitive receptors to substantial criteria pollutant concentrations and thus would result in a less-than-significant impact with regard to localized emissions.

With regard to CO concentrations, as discussed in Section IV.B, Air Quality, of this Draft EIR, the Project's off-site operational activities, including the highest average daily trips, would not expose sensitive receptors to substantial CO concentrations. As a result, impacts related to localized mobile-source CO emissions are considered less than significant.

As the Project would not contain substantial TAC sources and would be consistent with the California Air Resources Board (CARB) and SCAQMD guidelines, the Project would not expose off-site sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant.

(c) Contribute to Cumulative Emissions

As discussed above, the Project's operational air quality emissions, localized emissions and TACs would be less than significant. According to the SCAQMD, if an individual project results in air emissions of criteria pollutants that exceed the SCAQMD's recommended daily thresholds for project-specific impacts, then the project would also result in a cumulatively considerable net increase of these criteria pollutants.[6] As

[6] *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution. Appendix D, South Coast Air Quality Management District, August 2003.*

operational emissions did not exceed any of the SCAQMD's regional or localized significance thresholds, the emissions of non-attainment pollutants and precursors generated by project operation would not be cumulatively considerable.

(3) Cultural Resources—Human Remains

The Project Site is located within an urbanized area and has been subject to previous grading and development. No known traditional burial sites have been identified on the Project Site. In addition, if human remains were discovered during construction of the Project, work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5, and disposition of the human remains and any associated grave goods would occur in accordance with Public Resources Code Section 5097.91 and 5097.98, as amended. With the implementation of regulatory requirements, the Project would not disturb any human remains. Impacts related to human remains would be less than significant. Cumulative impacts would also be less than significant.

(4) Energy

(a) Wasteful, Inefficient, or Unnecessary Consummation of Energy Resources

(i) Construction

During Project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. Construction activities typically do not involve the consumption of natural gas. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities). As discussed in Section IV.D, Energy, of this Draft EIR, a total of 121,585 kWh of electricity, 286,370 gallons of gasoline, and 368,911 gallons of diesel is estimated to be consumed during Project construction.

As concluded in Section IV.C, Energy, a total of approximately 121,585 kWh of electricity is anticipated to be consumed during Project construction. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed, and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. In addition, although Title 24 requirements typically apply to energy usage for buildings, long-term construction lighting (longer than 120 days) providing

illumination for the site and staging areas would also comply with applicable Title 24 requirements. Furthermore, the Project would implement Project Design Feature AIR-PDF-1 in support of SCAQMD, which recommends use of electricity from electrical pole instead of diesel generators. Therefore, the demand for electricity during construction would not cause wasteful, inefficient, and unnecessary use of energy.

With regard to transportation fuels, trucks and equipment used during proposed construction activities would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. In addition to reducing criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy and reduce fuel consumption. In addition, on-road vehicles (i.e., haul trucks, worker vehicles) would be subject to Federal fuel efficiency requirements. Therefore, Project construction activities would comply with existing energy standards with regard to transportation fuel consumption. As such, the demand for petroleum-based fuel during construction would not cause wasteful, inefficient, and unnecessary use of energy.

Based on the above, Project construction activities would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during construction of the Project. Therefore, impacts related to energy use during construction would be less than significant.

(ii) Operation

As discussed in Section IV.D, Energy, of this Draft EIR, the Project would comply the 2019 Title 24 standards and applicable 2019 CALGreen requirements. The Project would also implement GHG-PDF-1 included in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, which states that the design of new buildings would include features so as to be capable of meeting the standards LEED Silver or equivalent green building standards under LEED v4 as well as use of Energy Star-labeled appliances, a reduction of indoor water use by at least 20 percent, use of plumbing fixtures and fitting that exceed the performance requirements specified in the LAMC, and use of a weather-based irrigation system and water efficient landscaping with use of drought tolerant plants in up to 60 percent of the proposed landscaping. In addition, the Project would also implement Project Design Feature WAT-PDF-1, presented in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, which states that the Project would incorporate water conservation features, such as high efficiency toilets with a flush volume of 1.0 gallons or less, waterless urinals, showerheads with a maximum flow rate of 1.5 gallons per minute or less, among others. These measures would further reduce the Project's energy demand. In addition, LADWP is required to procure at least 33 percent of their energy portfolio from renewable sources by 2020. Furthermore, the Project would

comply with Section 110.10 of Title 24, which includes mandatory requirements for solar-ready buildings, and, as such, would not preclude the potential use of alternate fuels.

With regard to natural gas, the Project Applicant would comply with the 2019 Title 24 standards and applicable 2019 CALGreen requirements. In addition, to complying with applicable regulatory requirements regarding energy conservation (e.g., California Building Energy Efficiency Standards and CALGreen), the Project would implement project design features to further reduce energy use, such as GHG-PDF-1 included in Section IV.F, Greenhouse Gas Emissions, of this Draft EIR, which states that the design of new buildings would include features so as to be capable of meeting the standards LEED Silver or equivalent green building standards under LEED v4, which entails implementing conservation features to reduce natural gas usage.

As discussed in Section IV.D, Energy, of this Draft EIR, the Project Site is located in a HQTA designated by SCAG and is located approximately 0.5 mile from two bus stops at Santa Monica Boulevard and Vine Street. The Project Site is also located less than 0.5 miles southeast of the Metro Hollywood/Vine Station. In addition, the Project Site is served by several bus stops located along Sunset Boulevard and Gower Street, including Metro bus line 2, Los Angeles Department of Transportation (LADOT) Downtown Area Shuttle (DASH) Hollywood, and DASH Hollywood/Wilshire. The Project would also provide short- and long-term bicycle parking spaces as required by the LAMC, in addition to bicycle-serving amenities that would further encourage biking, including the bicycle storage facility that includes locker rooms with bathrooms and showers. Furthermore, as discussed in Section IV.D, Energy, of this Draft EIR, incorporation of USEPA MXD VMT reduction features applicable to the Project would result in a 26-percent reduction in overall VMT and resultant transportation fuel consumption.

Based on the above, operation of the Project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during construction of the Project. Therefore, impacts related to energy use during operation of the Project would be less than significant, and no mitigation measures are required. Cumulative impacts would also be less than significant.

(b) Conflict with state or local plan for renewable or energy efficiency

The energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the 2019 CALGreen building code, and the City of Los Angeles Green Building Code. As these conservation policies are mandatory under the City of Los Angeles Building Code, the Project would not conflict with applicable plans for renewable energy or energy efficiency.

With regard to transportation related energy usage, the Project would comply with goals of the SCAG's 2016 RTP/SCS which incorporates VMT targets established by SB 375. The Project's mixed-use development and proximity to major job centers and public transportation would serve to reduce VMT and associated transportation fuel usage within the region. In addition, vehicle trips generated during Project operations would comply with Corporate Average Fuel Economy (CAFE) fuel economy standards. During construction activities, the Project would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations.

Based on the above, the Project would not conflict with adopted energy conservation plans, or violate state or federal energy standards. Therefore, Project impacts associated with regulatory consistency would be less than significant. Cumulative impacts would also be less than significant.

(5) Geology and Soils (Paleontological Resources—Unique Geologic Features)

With regard to unique geologic features, as discussed in Section IV.E, Paleontological Resources, of this Draft EIR, there are no distinct and prominent geologic or topographic features (i.e., hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands) on the Project Site or in the vicinity. Therefore, the Project would not destroy any distinct and prominent geologic or topographic features, and impacts to a unique geologic feature would be less than significant. Cumulative impacts would also be less than significant.

(6) Greenhouse Gas Emissions

As detailed in Section IV.F, Greenhouse Gas Emissions, the Project would result in a net increase of 4,648 $MTCO_2e$ annually. The breakdown of the Project's GHG emissions by source category shows approximately less than 1 percent from area sources; 36 percent from energy consumption; 50 percent from mobile sources; less than 1 percent from stationary sources; 1 percent from solid waste generation; 6 percent from water supply, treatment, and distribution; and 7 percent from construction activities. As shown in Table IV.F-6 in Section IV.F, Greenhouse Gas Emissions, of this Draft EIR, the Project would not conflict with the policies included in the *Climate Change Scoping Plan*. Although a number of these measures are currently established as policies and measures, some measures have not yet been formally proposed or adopted.

With regard to SCAG's 2016-2040 RTP/SCS, as shown in Table IV.F-7 in Section IV.F, Greenhouse Gas Emissions, of the Draft EIR, the total project VMT per capita is of 6.2 per day would be below the overall SCAG region's daily 20.5 totalVMT per capita for the 2040 Plan Year and Los Angeles County's 18.4 daily Total VMT per capita for the 2040

Plan Year. In comparison to the SCAG daily VMT per capita, the Project results in an approximately 26 percent reduction in GHG emissions from mobile sources in comparison to a project without reduction measures. This reduction is in line with the reduction in transportation emission per capita targeted by the 2016-2040 RTP/SCS and the updated SB 375 targets. This reduction is attributable to the Project characteristics of being an infill project near transit that supports multi-modal transportation options. It should be noted that the VMT per capita calculation is for informational purposes to demonstrate consistency with the 2016–2040 RTP/SCS as numeric thresholds have not been formally adopted. Furthermore, the Project is the type of land use development that is encouraged by the 2016–2040 RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the state's long-term climate policies.[7] By furthering implementation of SB 375, the Project supports regional land use and transportation GHG reductions consistent with state regulatory requirements. Therefore, the Project would be consistent with the GHG reduction-related actions and strategies contained in the 2016–2040 RTP/SCS. As such, impacts related to consistency with the 2016–2040 RTP/SCS would be less than significant.

Although the Sustainable City pLAn/L.A.'s Green New Deal is not an adopted plan or directly applicable to private development projects, the Project would generally comply with these aspirations as the Project is an infill development consisting of new studio-related creative office, production office/production support and storage uses on a Project Site located 0.5 mile northwest of the Metro Hollywood/Vine Station and with numerous nearby bus stops. Furthermore, the Project would comply with CALGreen, implement various project design features to reduce energy usage, and would comply with the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986) in furtherance of the aspirations included in the Sustainable City pLAn with regard to energy-efficient buildings and waste and landfills. The Project would also provide secure short- and long-term bicycle storage areas and shower facilities for Project employees and guests. Therefore, the Project would be consistent with the Sustainable City pLAn/LA's Green New Deal**.**

Based on the above and as discussed in detail in Section IV.F. Greenhouse Gas Emissions, the Project would not generate GHG emissions that may have a significant impact on the environment nor would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. Specifically, the Project would be consistent with the plans, policies, regulations and GHG reduction actions/strategies outlined in the *Climate Change Scoping Plan* and subsequent updates,

[7] *As discussed above, SB 375 legislation links regional planning for housing and transportation with the GHG reduction goals outlined in AB 32.*

the 2016–2040 RTP/SCS, and the Sustainable City pLAn/LA's Green New Deal. Therefore, Project-specific impacts with regard to climate change would be less than significant. The Project's cumulative contribution to global climate change would also be than significant as the analysis of a project's GHG emissions is inherently a cumulative impact analysis**.**

(7) Land Use

(a) General Plan Framework Element

(i) Land Use Chapter

As detailed in Section IV.G, Land Use, of this Draft EIR, the Project would accommodate new development within the existing Sunset Gower Studios in accordance with land use and density provisions of the General Plan Framework. The Project would also provide for a development that reduces vehicle trips, VMT, and air pollution by constructing compatible uses within one site located in proximity to several and in a community that would complement the established skill set of the local area's employment base, thus reducing the need for such employees to travel greater distances for employment opportunities. In addition, the Project Site is located in proximity to several transit options, which would facilitate use of other transportation options and reduce vehicle trips. Therefore, the Project would not conflict with the with applicable goals, policies, and objectives, and policies set forth in the Los Angeles General Plan Framework Element's Land Use Chapter

(ii) Urban Form and Neighborhood Design Character

As discussed in Section IV.G, Land Use and Planning, of this Draft EIR, the Project would introduce additional studio/media/entertainment-related office and production support space on a site traditionally occupied by studio uses that is located along a major transportation corridor, Sunset Boulevard. In addition, the Project would enhance the livability of the surrounding neighborhood with the development of Building A, which would create a central visual focal point for the Project Site along Sunset Boulevard and improve the walkability of Sunset Boulevard by creating visual interest and incorporating pedestrian friendly design principles. Additionally, Building B and Building C would contain landscaped terraces as well as pedestrian-scaled elements at ground level, which would provide further articulation to the building façades. The new parking structure would also replace a surface staging/service area at the corner of Gordon Street and Fountain Avenue and a two-story office building located on Gordon Street. The existing chain-link fence and masonry wall along Gordon Street and Fountain Avenue would also be removed. The parking structure would be constructed of polycarbonate panels and vertical black metal fins, and would incorporate extensive landscaping within a 16-foot setback at the corner of Gordon Street and Fountain Avenue, providing a buffer between the residential uses to the

south and the new parking structure and enhancing the pedestrian experience. The Project would also include improvements to the three existing parking structures along Gordon Street, consisting of cosmetic improvements to the façades of the structures and the installation of landscaping. This would visually integrate all of the existing and proposed parking structures, thereby creating a more visually unified streetscape. The Project would also encourage proper design to help increase personal safety by providing for the installation and use of a 24-hour security camera system throughout the Project; providing lighting of buildings and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings; providing lighting of parking areas to maximize visibility and reduce areas of concealment; and designing entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites. Therefore, The Project would not conflict with the objective of the General Plan Framework's Urban Form and Neighborhood Design Chapter.

(iii) Economic Development Chapter

The Project would support the City's objective to establish a balance of land uses that meets resident needs and fosters economic development by constructing studio-related office and production support space that expand upon the existing entertainment-related uses in Hollywood. In addition, the proposed uses would complement the established skill set of the local area's employment base. Therefore, the Project would not conflict with applicable objectives and policies that support the goals established in the General Plan Framework's Economic Development Chapter.

(iv) Transportation Chapter Mobility Plan 2035

The Project would support the City's policy to design detour facilities to provide safe passage for all modes of travel during construction through the implementation of a Construction Management Plan, as set forth in Project Design Feature TR-PDF-1. In addition, the Project would promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs through the development of additional studio/media/entertainment-related office and production support space on a site traditionally occupied by studio-related uses. Furthermore, the Project would encourage greater utilization of transportation demand measures (TDM) strategies to reduce dependency on single-occupancy vehicles, which is consistent with the City's policy, by implementing a TDM Program that would identify measures to reduce peak-hour vehicular traffic to and from the Project Site. Therefore, the Project would not conflict with applicable policies that support the goals and objectives established in the General Plan Framework's Transportation Chapter, which encompasses the City's Mobility Plan 2035.

(v) Infrastructure and Public Services Chapter

The Project would support the City's objective to pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality by not increasing the existing percentage of impervious surfaces within the Project Site, which would not create new potential for runoff water to exceed the capacity of existing stormwater drainage systems. In addition, the addition of landscaping, which would serve to retain stormwater runoff, would decrease post-development runoff during a 50-year storm event. Furthermore, the Project would implement Best Management Practices (BMPs) to filter, treat, and reduce stormwater pollutants prior to discharge from the Project Site, in accordance with the City's Low Impact Development (LID) requirements. In addition, through preparation of the Water Supply Assessment (WSA) for the Project, the LADWP has found that it would be able to meet the water demand of the Project as well as the existing and planned future water demands of its service area. The Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site. Therefore, the Project would not conflict with applicable policies that support the goals established in the General Plan Framework's Infrastructure and Public Services Chapter.

(b) Conservation Element.

The Project would maintain the integrity of the potential historic district in support of the Conservation Element's objective to maintain important historical sites. In addition, implementation of Mitigation Measure CUL-MM-1 through Mitigation Measure CUL-MM-6 included in Section IV.C, Cultural Resources, of this Draft EIR, would ensure the protection and proper maintenance of the potential historic district during and after implementation of the Project. However, the historic impact associated with the removal of the United Recording Building at 6050 Sunset Boulevard cannot be mitigated to a less-than-significant level and would, therefore, be significant and unavoidable. Consequently, the removal of the United Recording Building at 6050 Sunset Boulevard would not be consistent with the objective and policy for the conservation of cultural and historic resources set forth in the Conservation Element. Nevertheless, the *Sequoyah Hills Homeowners Association v. City of Oakland* court case ruled that a Project is not required to be an exact match to the objectives and policies of the General Plan to not pose a conflict.

(c) Hollywood Community Plan

The Project would support the objective of the Community Plan to make provision for a circulation system coordinated with land uses and densities that are adequate to accommodate traffic. In addition, the Project would promote the Community Plan's objective to occupy industrial uses with the types of industries which are indigenous to Hollywood. Furthermore, the Project Site is located along a portion of Sunset Boulevard that is highly urbanized with a high concentration of entertainment industry uses. The

Project is designed to meet the evolving needs of the entertainment industry, which has been vital to the character, economic health, and social identity of Hollywood. As such, the Project would be consistent with the Project Site's land use designation and would help to retain industries historically operated in Hollywood. Therefore, the Project would not conflict with the applicable objectives and policies of the Hollywood Community Plan adopted for the purpose of avoiding or mitigating an environmental effect.

(d) Hollywood Redevelopment Plan

In accordance with Section 411 of the Redevelopment Plan, the Project would contribute to additional entertainment industry growth in Hollywood by developing entertainment-related uses, including studio-related creative office and production office/production support uses, uses which are compatible and related entertainment industry uses. In addition, the proposed entertainment-related uses would provide commercial space related to the entertainment uses on the Project Site. Moreover, the Project would expand upon the existing and historic uses in the Hollywood area and allow the Sunset Gower Studios to meet the evolving needs of the entertainment industry for enhanced post-production facilities, compatible office space, and other studio/media/ entertainment-related facilities. The Project would also be located in close proximity to transit options and would provide adequate parking. However, as discussed in Section IV.C, Cultural Resources, of this Draft EIR, the Project would involve the removal of the United Recording building at 6050 Sunset Boulevard, which is eligible for listing in the National Register, California Register, and as a Los Angeles Historic-Cultural Monument for its associations with the music recording industry in Los Angeles. Although, the Project would maintain the integrity of the potential historic district in support of these goals, the removal of the United Recording Building at 6050 Sunset Boulevard would not be consistent with the Hollywood Redevelopment Plan's goals related to the preservation of landmarks and the retention and restoration of existing buildings, especially those having significant historic and/or architectural value. Nevertheless, the *Sequoyah Hills Homeowners Association v. City of Oakland* court case ruled that a Project is not required to be an exact match to the objectives and policies of the General Plan to not pose a conflict.

(e) LAMC

The proposed studio/media/entertainment-related office uses would be consistent with the existing zoning and would not represent a change in use for the Sunset Gower Studios. The Project would also be within the maximum FAR permitted for the Project Site. Specifically, the Project would remove 160,611 square feet of existing floor area and develop 627,957 square feet of floor area, resulting in a net increase of approximately 467,346 square feet of floor area. When averaged across the 15.9-acre portion of the

Project Site for which entitlements are requested, the 15.9-acre portion of the Project Site would have a FAR of 1.47:1, which would be below the existing FAR limitation of 1.5:1.[8] With respect to setback regulations, buildings erected and used exclusively for commercial or industrial purposes in the M1 zone do not require front, side, or rear yard setbacks. Therefore, the Project would not conflict with LAMC requirements.

Based on the above, the Project would not conflict with LAMC requirements. Furthermore, while the regulations listed in the LAMC could avoid or mitigate environmental impacts, the FAR regulations were not adopted for that purpose, nor would conflict with those requirements result in a significant environmental impact.

(f) 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS)

The Project would be developed within an existing urbanized area that provides an established network of roads and freeways that provide local and regional access to the area, including the Project Site. In addition, the Project Site is served by a variety of nearby mass transit options, including a number of bus lines. The Project would also provide bicycle parking spaces for the proposed uses that would serve to promote walking and use of bicycles. The Project would also include adequate parking to serve the proposed uses and would provide charging stations to serve electric vehicles. In addition, a Transportation Demand Management program is also proposed as part of the Project that would include strategies to promote non-automobile travel and reduce the use of single-occupant vehicle trips, thereby facilitating a reduction in VMT and improved air quality to contribute to the protection of the environment and the health of the community's residents. Overall, the Project would support the goals of the 2016–2040 RTP/SCS to maximize the productivity of the region's transportation system as well as protect the environment and health of the region's residents by improving air quality and encouraging active transportation (e.g., bicycling and walking). Therefore, the Project would not conflict with the applicable goals and principles set forth in the 2016–2040 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect.

Based on the above, the Project would not result in a significant environmental impact as a result of conflict with policies, plans, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. As such, impacts would be less than significant. Cumulative impacts would also be less than significant.

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[8] *The Project's FAR is calculated based on the 15.9-acre portion of the Project where new buildings are proposed and across which the floor area is being averaged, which is the only portion of the Project Site owned by the Applicant, and the portion of the Project Site to which the entitlements are being sought.*

(8) Noise

(a) Exposure to Noise Levels in Excess of Standards -Operational Noise

(i) On-Site Stationary Noise Sources

As indicated in Table IV.H-16 in Section IV.H, Noise, of this Draft EIR, the estimated noise levels from the mechanical equipment would range from 30.4 dBA (L_{eq}) at receptor location R3 to 39.1 dBA (L_{eq}) at receptor location R5, which would be well below the existing ambient noise levels of 61.8 dBA (L_{eq}) and 63.5 dBA (L_{eq}) at receptor locations R3 and R5, respectively. As such, the estimated noise levels at all off-site receptor locations would be below the significance threshold of 5 dBA (L_{eq}) above ambient noise levels (based on the lowest measured ambient). Therefore, noise impacts from mechanical equipment would be less than significant.

Table IV.H-18 in Section IV.H, Noise, of this Draft EIR presents the estimated noise levels at the off-site sensitive receptors resulting from the use of outdoor areas. The estimated noise levels were calculated with the assumption that all of the outdoor spaces would be fully occupied and operating concurrently to represent a worst-case noise analysis. As presented therein, the estimated noise levels from the outdoor spaces would range from 42.8 dBA (L_{eq}) at receptor R2 to 62.8 dBA (L_{eq}) at receptor R4 and would be below the significance criteria of 5 dBA (L_{eq}) above ambient noise levels (based on the lowest measured ambient noise level). As such, noise impacts from the use of the outdoor areas would be less than significant**.**

As shown in Table IV.H-19 in Section IV.H, Noise, of this Draft EIR, the estimated noise levels from the Project parking garage would range from 20.4 dBA (L_{eq}) at receptor location R4 to 49.9 dBA (L_{eq}) at receptor location R1, which would be well below the significance criteria of 5 dBA (L_{eq}) above the ambient noise levels (based on the lowest measured ambient). Therefore, noise impacts from the parking garage would be less than significant.

As indicated in Table IV.H-20 in Section IV.H, Noise, of the Draft EIR, the estimated noise from the loading dock and trash compactor would range from 28.8 dBA (L_{eq}) at receptor location R4 to 36.1 dBA (L_{eq}) at receptor location R3. The estimated noise levels from the loading dock and trash compactor at all off-site receptor locations would be below the significance criteria of 5 dBA (L_{eq}) above ambient noise levels. Therefore, noise impacts from loading dock and trash compactor operations would be less than significant**.**

(ii) Off-Site Mobile Sources

Under future with Project conditions, the Project would result in a maximum of a 1.9 dBA (CNEL) increase in traffic noise along the roadway segment Gordon Street

(between Sunset Boulevard and Fountain Avenue). At other analyzed roadway segments, the increase in traffic-related noise levels would be less than 0.5 dBA. The increase in traffic noise levels would be below the relevant 3 dBA CNEL significance criteria. Under existing plus Project conditions, the Project would result in a maximum of a 1.8 dBA (CNEL) increase in traffic noise along the roadway segment Gordon Street (between Sunset Boulevard and Fountain Avenue). At other analyzed roadway segments, the increase in traffic-related noise levels would be 0.4 dBA or lower. The estimated increase in traffic noise levels as compared to existing conditions would be well below the relevant 3-dBA CNEL significance criteria. Therefore, traffic noise impacts of the Project would be less than significant.

(b) Composite Noise Level Impacts from Project Operations

As shown in Table IV.H-23 in Section IV.H, Noise, of this Draft EIR, the Project would result in an increase in composite noise levels ranging from 0.4 dBA at receptor location R4 to 1.5 dBA at receptor location R5. The composite noise levels from Project operation at the off-site receptor locations would be below the 3-dBA significance criteria (applicable to receptor locations R4 and R5) as the composite (Project plus ambient) noise level falls within the normally unacceptable (70 to 75 CNEL) and clearly unacceptable (greater than 75 CNEL) land use categories and the 5-dBA significance criteria (applicable to receptor locations R1, R2 and R3) as the composite noise levels fall within the conditionally acceptable (60 to 70 CNEL) land use category. Noise levels generated by filming within the sound stages would be contained with the sound insulated sound stages. Noise levels associated with outdoor filming (on rare occasions) would be shielded to the off-site noise sensitive uses by the buildings at the perimeter of the Project Site. Nevertheless, noise levels associated with the existing studio production would be similar to the existing conditions and would not result in an increase as related to the Project. As such, composite noise level impacts due to Project operations would be less than significant and the Project would not result in a substantial permanent increase in ambient noise levels in the vicinity of the Project Site above existing levels without the Project.

(c) Summary of Cumulative Operational Noise Impacts

The Project and related projects would not result in the generation of noise levels in excess of standards established by the City. Therefore, cumulative operational noise impacts from on-site and off-site sources would be less than significant.

(d) Operational Vibration

The primary source of vibration related to operation of the Project would include vehicle circulation within the proposed subterranean parking garage and off-site vehicular trips. Vibration levels generated by Project vehicle circulation would be similar to existing operations, including deliveries. However, vehicular-induced vibration is unlikely to be

perceptible by people. The Project would also include typical commercial-grade stationary mechanical (HVAC) equipment, mounted at the roof level or within the building, that would include vibration-attenuation mounts to reduce the vibration transmission. The Project does not include land uses that would generate high levels of vibration. In addition, ground-borne vibration attenuates rapidly as a function of distance from the vibration source. Therefore, operation of the Project would not increase the existing vibration levels in the immediate vicinity of the Project Site, and, as such, vibration impacts associated with operation of the Project would be less than significant. Cumulative operational vibration impacts would also be less than significant.

(9) Public Services—Fire Protection

(a) Construction

As discussed in Section IV.I.1, Public Services—Fire Protection, Project construction would comply with regulations set forth in the Occupational Safety and Health Administration's (OSHA) safety and health provisions as well as with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, compliance with regulatory requirements would effectively reduce the potential for Project construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

In addition, while most construction activities are expected to be primarily contained within the boundaries of the Project Site, access to the Project Site and the surrounding vicinity could be impacted by temporary lane closures, roadway/access improvements, and the construction of utility line connections. Therefore, the Project would implement a Construction Management Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 in Section IV.J, Transportation, of this Draft EIR, to ensure that adequate and safe access remains available within and near the Project Site during construction activities. In addition, construction-related traffic, including hauling activities and construction worker trips would occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts.

Based on the above and as discussed in more detail in Section IV.I.1. Public Services—Fire Protection, Project construction would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility, the construction of which would cause significant environmental effects, in order to maintain service. Therefore, impacts to fire protection services during Project construction would be less than significant.

(b) Operation

As discussed in Section IV.I.1, Public Services—Fire Protection, of this Draft EIR, compliance with applicable Los Angeles Building Code and Fire Code requirements would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment, thereby reducing the need for a new fire station, or the expansion, consolidation, or relocation of an existing fire station.

With regard to emergency access, as discussed in Section IV.I.1, Public Services—Fire Protection, of this Draft EIR, the Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. The Project also would not include the installation of barriers that could impede emergency vehicle access. Furthermore, drivers of emergency vehicles have the ability to avoid traffic by using sirens and flashing lights to clear a path of travel, pursuant to CVC Section 21806.

In addition, based on the Information of Fire Flow Availability Report (IFFAR), the nine existing public fire hydrants within and adjacent to the Project Site flowing simultaneously can deliver combined flows of 12,000 gpm, which meets the required fire flow for the Project Site. Therefore, based on the IFFAR, there is adequate fire flow available for the Project to comply with the fire flow requirements identified for the Project in accordance with LAMC Section 57.507.3.1. In addition, LADWP also determined that no additional fire hydrants would be required to provide adequate fire coverage; however, if later required by the LAFD during their fire/life safety plan review, the Project would install additional fire hydrant(s) to meet the hydrant spacing requirements as set forth in LAMC Section 57.507.3.2. Furthermore, in accordance with LAMC Section 57.4705.4, the Project would incorporate a fire sprinkler suppression system, which would reduce the public hydrant demands.

Additionally, in conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board of Trustees of the California State University* ruling, the city is obligated to provide adequate public safety services, including fire protection services, and the need for additional public safety services is not an environmental impact that CEQA requires a project proponent to mitigate.

Based on the analysis above, Project operation would not require the addition of a new fire station or the expansion of an existing facility in order to maintain service. Therefore, operation of the Project would not result in substantial adverse physical impacts

associated with the provision of new or physically altered governmental facilities (fire protection), the construction of which would cause significant environmental impacts, in order to maintain acceptable fire protection services. Project impacts would be less than significant. Cumulative impacts on fire protection would also be less than significant.

(10) Public Services—Police Protection

(a) Construction

As discussed in Section IV.I.2, Public Services—Police Protection, of this Draft EIR, the LAPD considers the residential population within their service area to evaluate service capacity. Construction activities associated with the Project would not generate a permanent population on the Project Site that would substantially increase the police service population of the Hollywood Area and Hollywood Community Police Station. Notwithstanding, construction sites can be sources of nuisances and hazards and invite theft and vandalism. Therefore, the Project would implement project design features to reduce the potential demand on police protection services at the Project Site associated with theft and vandalism during construction.

Project construction activities could also potentially impact the provision of LAPD police protection services in the vicinity of the Project Site due to construction impacts on the surrounding roadways. However, as discussed above, construction-related traffic, including hauling activities and construction worker trips would occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts. In addition, a Construction Management Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 in Section IV.J, Transportation, of this Draft EIR, to ensure that adequate and safe access remains available within and near the Project Site during construction activities.

Based on the above, construction activities would not necessitate the provision of new or physically altered government facilities in order to maintain the LAPD's capability to serve the Project Site. Therefore, impacts on police protection services during Project construction would be less than significant.

(b) Operation

As discussed in Section IV.I.2, Public Services—Police Protection, of this Draft EIR, the Project does not include the development of residential uses. As such, the Project would not directly affect the existing officer-to-resident ratio within the Hollywood Area. However, the Project would introduce a new employee and visitor population to the Project Site, which could result in an indirect demand for police services in the Hollywood Area. Nevertheless, these employment opportunities would include a range of full-time and part-

time positions, which may be filled, in part, by employees already residing in the vicinity of the Project Site or by people who would commute and who would not relocate their place of residence. Furthermore, the Project would implement several project design features, which would help offset the Project-related increase in demand for police services.

As discussed in Section IV.I.2, Public Services—Police Protection, of this Draft EIR, the Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. The Project also would not include the installation of barriers that could impede emergency vehicle access within the vicinity of the Project Site. As such, emergency access to the Project Site and surrounding area would be maintained. Furthermore, in accordance with CVC Section 21806, drivers of police emergency vehicles have the ability to avoid traffic by using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic.

Additionally, in conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board of Trustees of the California State University* ruling, the city is obligated to provide adequate public safety services, including police protection services, and the need for additional public safety services is not an environmental impact that CEQA requires a project proponent to mitigate.

Therefore, based on the above, Project operation would not require a new or physically altered police facility of which would cause significant environmental impacts, in order to maintain acceptable police protection services. Impacts on police protection services during operation of the Project would be less than significant. Cumulative impacts would also be less than significant.

(11) Transportation

(a) Consistency with Applicable Programs, Plans, Ordinances, and Policies

(i) Mobility Plan 2035

The Project is consistent with the goals of the Mobility Plan as the Project does not require any dedications or improvements along the streets adjacent to the Project perimeter to serve the long-term mobility needs identified in Mobility Plan 2035. In addition, the Project does not propose repurposing existing curb space and does not propose narrowing or shifting existing sidewalk placement or paving, or narrowing, shifting, or removing an existing parkway. The Project also does not propose modifying, removing, or otherwise affecting existing bicycle infrastructure, and the Project driveways are not proposed along a street with a bicycle facility. Furthermore, the Project would promote pedestrian activity and reduce vehicle trips and VMT by encouraging the use of alternative

modes of transportation; providing convenient and adequate bicycling facilities; and enhancing pedestrian amenities through the provision of roof gardens and terraces, courtyards, paseos, and walkways, which would include accent paving, seating, and other landscape elements. In addition, the Project would comply with the emergency access set forth by LAFD and all driveways would be maintained to limit potential impediments to visibility. Therefore, the Project would meet the goals of the Mobility Plan and would not interfere with any other policies of the Mobility Plan. Thus, the Project would be consistent with the Mobility Plan.

(ii) Plan for a Healthy Los Angeles

As discussed in Section IV.J, Transportation, of the Draft EIR, the Project supports healthy lifestyles by reducing single-occupant vehicle trips by virtue of its location near to abundant high-quality and high-frequency transit options and its provision of a TDM measures and participation in the Hollywood TMO. Specifically, the Project would provide a 1,450-square-foot bicycle parking facility and a total 284 bicycle parking spaces, including 102 short-term and 182 long-term bicycle parking spaces. Therefore, the Project would not conflict with any other policies recommended by the plan and is consistent with Plan for a Healthy Los Angeles.

(iii) LAMC

In accordance with LAMC Section 12.21.A.16, the Project would provide a total 284 bicycle parking spaces, including 102 short-term and 182 long-term bicycle parking spaces. In addition, the Project would incorporate TDM measures as part of the project design aimed at encouraging use of alternative transportation modes in line with the requirements set forth in the TDM Ordinance. Furthermore, the Project Site meet the half-width roadway and right-of-way requirements of the Mobility Plan, the Project would not conflict with LAMC Section 12.37.

(iv) Vision Zero

No Vision Zero improvements are currently planned near the Project site. The Project would not preclude future Vision Zero safety improvements by the City. Thus, the Project does not conflict with Vision Zero.

(v) Citywide Design Guidelines

The Project site promotes the safety and comfort of pedestrians by providing adequate sidewalks along the perimeter of the Project Site, new pedestrian walkway and landscaped courtyards to connect new buildings, and trees and seating to provide adequate shade and a more comfortable mobility environment for pedestrians. Therefore, the Project would align with *Citywide Design Guidelines* and *City of Los Angeles Urban*

Design Principles to provide a safe, comfortable, and accessible experience for all transportation modes.

(vi) Walkability Checklist

As discussed in Section IV.J, Transportation, of this Draft EIR, the Project would provide continuous and adequate sidewalks along the Project Site, enhance pedestrian amenities through landscaped courtyards, paseos, and walkways, provide trees, accent paving, seating, and other landscape elements to provide adequate shade and habitat to for a more comfortable mobility environment for pedestrians. These features support the Walkability Checklist recommendations regarding the pedestrian experience.

(vii) LADOT's Transportation Technology Strategy and Design Standards

The Project would not interfere with any of the general policy recommendations, pilot proposals, or action steps set forth in LADOT's *Urban Mobility in a Digital Age: A Transportation Technology Strategy for Los Angeles* and *Technology Action Plan*. Additionally, the Project would comply with all applicable LADOT design standards.

(viii) Other Plans and Policies

As discussed in detail in Section IV.G, Land Use, of this Draft EIR, the Project would not conflict with SGAG RTP/SCS or Hollywood Community Plan policies related to encouraging pedestrian activity and reducing VMT. In addition, as discussed in Section IV.G. Land Use, the Project would not conflict with the relevant goals and policies of the Redevelopment Plan. Therefore, the Project would not conflict with these plans, and policies**.**

Based on the above, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities**.** Cumulative impacts related to consistency with applicable programs, plans, ordinances, and policies would also be less than significant.

(b) VMT

As discussed in Section IV.J, Transportation, of this Draft EIR, based on the Project's proposed land uses and location, the following assumptions were identified in the VMT Calculator:

- Total Population: 0
- Total Employees: 3,996

- APC: Central
  - Household VMT Impact Threshold: 6.0 VMT per capita
  - Work VMT Impact Threshold: 7.6 VMT per employee
- TBZ: Urban
- Maximum VMT Reduction: 75%

As shown in Table IV.J-2 in Section IV.J, Transportation, of this Draft EIR, the VMT Calculator estimates that the Project would generate 44,311 daily VMT and 24,923 Work VMT, prior to implementation of the project design features. Thus, based on the employee assumptions above, the Project would generate an average work VMT per employee of 6.2. The work VMT per employee would fall below the significance threshold for the Central APC of 7.6 work VMT per employee. Therefore, the Project would not result in a significant VMT impact and no mitigation measures would be required. Nevertheless, the TDM strategies included as Project Design Feature PDF-TR-2 were assessed for purposes of comparing the VMT results. With implementation of the project design features, the VMT Calculator estimates that the Project would generate 40,912 daily VMT and 23,011 work VMT, resulting in an average work VMT per employee of 5.8 and an additional reduction of the Project's daily work VMT on the surrounding street system. Therefore, the Project would not result in a significant VMT impact, and would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). Cumulative impacts would also be less than significant.

(c) Hazards Due to Design Features

The roadways adjacent to the Project Site are part of the existing urban roadway network and contain no sharp curves or dangerous intersections, and the Project does not include any proposed modifications to the street system or any dangerous design features. Specifically, vehicular access to the Project Site would be maintained via an existing full-access driveway on Sunset Boulevard at Beachwood Drive and existing full-access driveways on Gordon Street. Emergency and limited access would continue to be provided along Fountain Avenue. Although vehicle access is not provided, limited pedestrian access is provided along Gower Street, in addition to Sunset Boulevard and Gordon Street. Bicycle access to the Project site would be shared with the vehicular access. No additional access points, excessive driveway widening, or physical modifications to the public right-of-way are proposed. In addition, no street dedication is required on the streets surrounding the Project Site perimeter as the existing right-of-way meets the street standards. Furthermore, the creative office and production support uses proposed by the Project would be consistent with the surrounding uses in the vicinity of the Project Site and would not introduce any hazards onto or adjacent to the Project Site. The Project design would also be reviewed by the Los Angeles Department of Building and Safety and the Los

Angeles Department of Transportation during the City's plan review process to ensure all applicable building design requirements are met. Therefore, impacts with respect to hazardous design features would be less than significant. Cumulative impacts would also be less than significant.

(d) Emergency Access

(i) Construction

As discussed in Section IV.J, Transportation, of this Draft EIR, construction activities associated with the Project could potentially impact the provision of emergency services by the LAFD and the LAPD in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. In addition, construction activities also would generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. However, as discussed in Section IV.J, Transportation, of this Draft EIR, the construction of the Project would not require the closure of any vehicle travel lanes as the majority of construction activities would take place within the Sunset Gower Studios campus. Pursuant to Project Design Feature TR-PDF-1, a Construction Traffic Management Plan would be prepared and submitted to LADOT for review and approval, and would ensure that adequate and safe access will remain available within and near the Project Site during construction activities. The Project would ensure that travel lanes would continue to be maintained in each direction throughout the construction period. In addition, the scheduling of haul truck and construction worker trips outside weekday peak traffic periods to the extent feasible would lessen any potential impact. Therefore, the Project would not result in inadequate emergency access during construction, and impacts would be less than significant.

(ii) Operation

Existing vehicular access to the Project Site would be maintained and would be provided via the existing driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. The Project also would not include the installation of barriers that could impede emergency vehicle access. Additionally, as set forth in Section IV.G.2, Public Services—Police Protection, of this Draft EIR, pursuant to Project Design Feature POL-PDF-7, upon completion of the Project and prior to the issuance of a certificate of occupancy, the Applicant would also submit a diagram of the Project Site to the LAPD's Hollywood Area Commanding Officer that includes access routes and any additional information that might

facilitate police response. As such, emergency access to the Project Site and surrounding area would be maintained and the Project would not result in inadequate emergency access during operation of the Project.

The additional traffic generated by the Project could also affect emergency response due to increased congestion. However, as discussed in the non-CEQA analysis included in the Approved Traffic Study, the Project would not result in traffic that would substantially reduce the level of service of the street system in the Project vicinity. Furthermore, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Based on the above, the Project would not result in inadequate emergency access, and, as such, impacts to emergency access would be less than significant. Cumulative impacts would also be less than significant.

(12) Tribal Cultural Resources

No pre-historic archaeological sites, or other resources documented to be related to past Native American activity, have been previously identified within the Project Site. According to the Tribal Cultural Resources Report, a large number of previously recorded cultural resources are in the vicinity of the Project Site. All but one of these resources are historic-age built environment resources and no prehistoric archaeological resources have been previously recorded within half a mile of the Project. The single archaeological resource consists of historic-age features indicative of pre-World War II occupants in the area (P-19-003454). None of the recorded resources are located on the Project Site and would not be affected by development of the Project. In addition, South Central Coastal Information Center and Native American Heritage Commission records indicated that no know tribal cultural resources have been identified within the Project Site or in the immediate vicinity of the Project Site. Overall, impacts to such resources would be less than significant. Cumulative impacts would also be less than significant.

(13) Utilities and Service Systems—Water Supply and Infrastructure

(a) Water Infrastructure

(i) Construction

As discussed in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project would require the installation of new service connections to connect the proposed buildings to the existing water mains adjacent to the Project Site. Construction impacts associated with the installation of water distribution lines would primarily involve trenching to place the lines below surface. Installation of water

distribution lines would also include on-site water distribution improvements and off-site work associated with connections to the public main. With regard to potential impacts to the existing water distribution system, the Project contractors would coordinate with the LADWP to identify the locations and depth of all existing water lines prior to ground disturbance and LADWP would be notified in advance of proposed ground disturbance activities in order to avoid water lines and disruption of water service. The limited off-site connection activities could also temporarily affect access in adjacent right-of-ways. However, pursuant to Project Design Feature TR-PDF-1, a Construction Management Plan would be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Therefore, construction activities associated with the Project would not require or result in the relocation or construction of new water facilities or expansion of existing facilities that could cause a significant environmental effect. Therefore, impacts would be less than significant.

(ii) Operation

As discussed in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, based on the completed Information of Fire Flow Availability Request (IFFAR), the nine existing public fire hydrants flowing simultaneously can deliver a combined flow of 12,000 gpm at a minimum residual pressures ranging from 78 to 88 pounds per square inch. Therefore, based on the IFFAR, the Project has adequate fire flow available to comply with the standards specified in LAMC Section 57.507.3.1.

Furthermore, the Project will incorporate a fire sprinkler suppression system to reduce or eliminate the public hydrant demands, which will be subject to LAFD review and approval during the design and permitting of the Project. In. addition, based on the Service Advisory Requests, LADWP determined that the existing public water infrastructure would provide adequate water pressure to serve the Project Site's anticipated water demand.

With regard to the domestic water infrastructure, new domestic services would be connected from the existing 8-inch water line along North Beachwood Drive. No expanded main water facilities would be required by the Project. In addition, based on the LADWP Water Will-Serve Letter, the existing water infrastructure along Sunset Boulevard has sufficient capacity to serve the Project's anticipated water demand. Additionally, as set forth below, LADWP has sufficient supplies available to serve the Project. Therefore, the Project would not result in a demand for new water pumping, extraction or purification facilities.

Based on the above, the Project would not exceed the available capacity of the existing water distribution infrastructure that would serve the Project Site. Accordingly, the Project would not require or result in the relocation or construction of new or expanded

water facilities, the construction or relocation of which could cause significant environmental effects. Therefore, the Project's operational impacts to water infrastructure would be less than significant. Cumulative impacts would also be less than significant.

(b) Water Supply

(i) Construction

As discussed in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, construction-related water use would range from 1,000 gallons per day (gpd) to 2,000 gpd. As concluded in LADWP's 2015 Urban Water Management Plan, projected water demand for the City would be met by the available supplies during all hydrologic conditions (average year, single-dry year, and multiple-dry year) in each year from 2020 through 2040. Construction of the Project would be complete by 2028. Therefore, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of Project construction. As such, enough water supplies would be available to serve the Project during construction. Therefore, the Project's construction-related impacts on water supply would be less than significant.

(ii) Operation

As discussed in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, development of the Project would result in an increase in long-term water demand for consumption, operational uses, maintenance, and other activities on the Project Site. Specifically, based on the WSA prepared for the Project by LADWP, the Project would result in a net average daily water demand of 83,509 gpd, or approximately 93.56 acre-feet per year, including water savings as required by the LAMC and additional water saving features as set forth in Project Design Feature WAT-PDF-1. As provided in the WSA, LADWP indicated that the projected water supplies for normal, single-dry, and multiple-dry years reported in LADWP's 2015 Urban Water Management Plan would be sufficient to meet the Project's estimated water demand, in addition to the existing and planned future water demands within LADWP's service area through the year 2040. As such, the estimated water demand for the Project would not exceed the available supplies. Therefore, the Project's operation-related impacts on water supply would be less than significant. Cumulative impacts associated with water supply would also be less than significant.

(14) Utilities and Service Systems—Wastewater

(a) Wastewater Infrastructure

(i) Construction

As discussed in Section IV.L.2, Utilities and Service Systems—Wastewater, of this Draft EIR, wastewater generation during construction of the Project would be temporary and nominal when compared with the Project Site wastewater generation under existing conditions. In addition, wastewater generated during construction would be offset by the existing creative office, production support, and sound stage uses to be removed. Furthermore, construction workers would typically utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. Thus, wastewater generation from Project construction activities would not cause a measurable increase in wastewater flows.

Construction impacts associated with connecting on-site wastewater lines to the sewer mains adjacent to the Project Site would be temporary in nature and generally limited to trenching. However, as set forth in Project Design Feature TR-PDF-1, a Construction Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts. Overall, when considering impacts resulting from the installation of any required wastewater infrastructure, impacts would be of a relatively short-term duration and would cease to occur once the installation is complete.

Based on the above, Project construction would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects, and impacts to the wastewater conveyance or treatment system would be less than significant.

(ii) Operation

As discussed Section IV.L.2, Utilities and Service Systems—Wastewater, of this Draft EIR, it is estimated that the Project would generate a net increase in the average daily wastewater flow from the Project Site of approximately 80,240 gpd. As concluded in the Sewer Capacity Availability Request (SCAR), based on the current approximate flow levels and design capacities in the sewer system, and the Project's estimated wastewater flow, the City determined that the existing capacity of the sewer mains serving the Project Site would be adequate to accommodate the additional wastewater infrastructure demand created by the Project. Specifically, the Project's net increase of 80,240 gpd would be well within the approved discharge of up to 90,643 gpd for the 8-inch water main on North Beachwood Drive. Accordingly, Project operation would not require or result in the construction or expansion of wastewater facilities in a manner that would cause significant

environmental effects. Operational impacts with respect to wastewater infrastructure capacity would be less than significant.

(b) Wastewater Treatment

The remaining available capacity at the Hyperion Water Reclamation Plant (HWRP) is approximately 175 mgd. As shown in Table IV.L.2-2 in Section IV.L.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the Project would generate a net increase in wastewater flow from the Project Site of approximately 80,240 gpd, or approximately 0.08 mgd. The Project's increase in average daily wastewater flow of 0.08 mgd would represent approximately 0.05 percent of the current 175 mgd remaining available capacity of the HWRP.[9] Therefore, the Project-generated wastewater would be accommodated by the existing capacity of the HWRP.

Based on Los Angeles Department of Sanitation and Environment's (LASAN) average flow projections for the HWRP, it is anticipated that average flows in 2028, the Project build-out year, would be approximately 271.2 mgd.[10] Accordingly, the future remaining available capacity in 2028 would be approximately 175 mgd. Therefore, the Project's increase in average daily wastewater flow of 0.08 mgd would also represent approximately 0.05 percent of the 175 mgd future remaining available capacity of the HWRP.

Additionally, the Project's net increase in average daily wastewater generation of 0.08 mgd plus the current average flows of approximately 275 mgd to the HWRP would represent approximately 61.1[11] percent of the HWRP's capacity of 450 mgd. With regard to future flows, the Project's net increase of 0.08 mgd plus the projected flows of approximately 271.2 mgd to the HWRP would also represent approximately 60.3[12] percent of the HWRP's assumed future capacity of 450 mgd.

Overall, the Project's additional wastewater flows would not substantially or incrementally exceed the future scheduled capacity of any treatment plant. Therefore, there is adequate treatment capacity to serve the Project's projected demand in addition to

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[9] *(80,240 gpd ÷ 175 mgd) × 100 = ~ 0.05 mgd.*

[10] *Los Angeles Department of Water and Power, One Water LA 2040 Plan, Volume 2, Table ES.1, Projected Wastewater Flows. Based on a straight-line interpolation of the projected flows for the Hyperion Water Reclamation Plant for 2020 (approximately 256 mgd) and 2030 (approximately 275 mgd). The 2028 value is extrapolated from 2020 and 2030 values: [(275 mgd – 256 mgd) ÷ 10) * 8] + 256 = 271.2 mgd.*

[11] *[(80,240 gpd + 275 mgd) ÷ 450 mgd] x 100 = ~61.1%*

[12] *[(80,240 gpd + 271.2 mgd) ÷ 450 mgd] x 100 = ~60.3%*

existing LASAN commitments. As such, the Project would result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments, and impacts would be less than significant.

Based on the above, Project impacts associated with wastewater would be less than significant. Cumulative impacts associated with wastewater would also be less than significant.

(15) Utilities and Service Systems—Energy Infrastructure

(a) Construction

(i) Electricity

During construction of the Project, electricity usage represents approximately two percent of the estimated net annual operational demand for the Project which, as discussed below, would be within the supply and infrastructure service capabilities of LADWP.[13] Moreover, construction electricity usage would be offset by the elimination of 160,611 square feet of existing floor area, which currently generates a demand for electricity. As existing power lines are located in the vicinity of the Project Site, temporary power poles may be installed to provide electricity during Project construction. Existing off-site infrastructure would not have to be expanded, and the Project would not require the construction of new electrical infrastructure to provide electrical service to the Project Site during construction or demolition.

With regard to existing electrical distribution lines, the Applicant would be required to coordinate electrical infrastructure removals or relocations with LADWP and comply with site-specific requirements set forth by LADWP. As discussed in Section IV.L.3, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR, a series of LADWP lines that run overhead along North Beachwood Drive that provide electricity to the surrounding buildings and parking structures could be extended to serve the site without disrupting existing electrical service to other properties. As such, construction of the Project is not anticipated to adversely affect the electrical infrastructure serving the surrounding uses or utility system capacity.

Based on the above, Project construction would not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities that

[13] *The percentage is derived by taking the total amount of electricity usage during construction (121,585 kWh) and dividing that number by the total amount of net electricity usage during operation (6,463,069 kWh) to arrive at 2 percent.*

could result in the construction of new or expanded energy facilities, the construction of which could cause significant environmental effects.

(ii) Natural Gas

Natural gas would not be supplied to support Project construction activities; thus, there would be no demand generated by construction. However, the Project would involve installation of new natural gas connections to serve the Project Site. Since the Project Site is in an area already served by existing natural gas infrastructure, it is anticipated that the Project would not require extensive off-site infrastructure improvements to serve the Project Site. Construction impacts associated with the installation of natural gas connections are expected to be confined to minor trenching in order to place the lines below surface and Project contractors would notify and coordinate with the Southern California Gas Company (SoCalGas) to identify the locations and depth of all existing gas lines and avoid disruption of gas service to other properties. Therefore, construction of the Project would not result in an increase in demand for natural gas to affect available supply or distribution infrastructure capabilities and would not result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

(b) Operation

(i) Electricity

As discussed in Section IV.L.3, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR, LADWP has confirmed that the Project's electricity demand can be served by the facilities in the Project area.[14] Furthermore, the Project would implement any necessary connections and upgrades required by LADWP to ensure that LADWP would be able to adequately serve the Project. As such, operation of the Project is not anticipated to adversely affect the electrical infrastructure serving the surrounding uses or utility system capacity and would not result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects

(ii) Natural Gas

As discussed in Section IV.L.3, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR, SoCalGas has confirmed that the Project's natural gas demand can be served by the facilities in the Project area.[15] Furthermore, the Project

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[14] *KPFF Consulting Engineers., Utility Technical Report: Water, Wastewater, and Energy, June 2019. Refer to Appendix L of this Draft EIR.*

[15] *LADWP, 2017 Power Strategic Long-Term Resources Plan, December 2017, Appendix A, Table A-1.*

would implement any necessary connections and upgrades required by SoCalGas to ensure that SoCalGas would be able to adequately serve the Project. Thus, operation of the Project would not result in an increase in demand for natural gas to affect available supply or distribution infrastructure capabilities and would not result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Based on the above, Project impacts associated with energy infrastructure would be less than significant. Cumulative impacts associated with energy infrastructure would also be less than significant.

b. Less Than Significant with Mitigation

(1) Cultural Resources—Archaeological Resources

The results of the archaeological records search indicate that there are no identified archaeological sites within the Project Site and one archaeological site is located within a 0.5-mile radius of the Project Site. Notwithstanding, the Project would involve excavation of the Project Site to a maximum depth of approximately 42 feet below grade, and previously unknown archaeological resources could be encountered. Therefore, the possibility exists that archaeological artifacts that were not recovered during prior construction or other human activity may be present. As such, the Project would implement Mitigation Measure CUL-MM-7, which requires a qualified archaeologist to be retained to perform periodic inspections of excavation and grading activities of the Project Site. In the event archaeological materials are encountered, the archaeologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. Implementation of Mitigation Measure CUL-MM-7 would ensure that any potential impacts related to archaeological resources would be less than significant. Cumulative impacts would also be less than significant.

(2) Geology and Soils (Paleontological Resources)

As discussed in Section IV.E. Paleontological Resources, a records search conducted for the Project Site indicates there are no previously encountered fossil vertebrate localities located within the Project Site. The closest identified localities in proximity to the Project Site were collected at depths between 47 and 80 feet below the surface area. The paleontological records search indicates that grading or very shallow excavations in the uppermost layers of soil and Quaternary Alluvium deposits in the Project Site are unlikely to discover significant vertebrate fossils. However, according to the paleontological records search, deeper excavations have the potential to encounter significant remains of fossil vertebrates. As grading would occur to a maximum depth of

approximately 42 feet, the possibility exists that paleontological artifacts that were not recovered during prior construction or other human activity may be present. Therefore, the Project would implement Mitigation Measure PAL-MM-1, which requires a qualified paleontologist would be retained to perform periodic inspections of excavation and grading activities of the Project Site. In the event paleontological materials are encountered, the paleontologist would temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. Implementation of Mitigation Measure PAL-MM-1, the Project would ensure that any potential impacts related to paleontological resources would be less than significant. Cumulative impacts would also be less than significant.

(2) Noise

With implementation of Mitigation Measure NOI-MM-2 and compliance with LAMC Section 91.3307, vibration levels at the exterior of the on-site historic buildings would not exceed the significance criteria of 0.12 PPV for building damage. Therefore, vibration impacts, pursuant to the threshold for building damage, associated with the on-site construction activities would be reduced to a less-than-significant level.

c. Significant and Unavoidable

(1) Air Quality

(a) Regional Air Emissions and Air Quality Standards

As presented in Table IV.B-6 in Section IV.B, Air Quality, of this Draft EIR, regional NO_X emissions would exceed the SCAQMD regional threshold during peak periods of construction. The maximum daily regional NO_X emissions of 261 pounds per day would be anticipated to occur for four days during the overlap of concrete pour days associated with the Subterranean Parking Structure and overlap with building construction of Building A and Parking Structure. Therefore, regional construction emissions resulting from the Project would result in a significant short-term impact. Mitigation Measure AIR-MM-1 would reduce this impact. However, impacts would remain significant and unavoidable.

(b) Contribute to Cumulative Emissions

As discussed above, the Project would exceed SCAQMD's regional NO_X significance threshold during peak periods of construction. Based on SCAQMD guidance, individual construction projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions

for those pollutants for which the Air Basin is in non-attainment.[16] Therefore, the Project's contribution to cumulative air quality impacts due to regional NO_X emissions would be cumulatively considerable.

(2) Cultural Resources—Historical Resources

As discussed in Section IV.C, Cultural Resources, of this Draft EIR, after implementation of the Project, the potential historic district would continue to retain a concentration of buildings that date from the period of significance and reflect the historic identity of Columbia Studios as a "Big Eight" motion picture studio operating during the Major Studio Era. These buildings represent a large majority of the existing contributing square footage and highest levels of integrity (i.e., the ability to convey the significance of the potential historic district as evidenced by the survival of physical characteristics that existed during the property's historic period) among the contributing buildings. The contributing buildings to remain also include all contributors located on the western edge of the property facing Gower Street, which is the only portion of the potential historic district directly visible to the public.[17] In addition, the proposed locations for new construction are either located outside of the potential historic district or generally retain the existing historic spatial and circulation patterns. Specifically, this includes the retention of the central Beachwood Avenue and parallel Beachwood Alley as separate and distinct streets as well as the internal pathways between buildings on the western portion of the property.

Overall, despite the loss of six contributing buildings, 16 of the 22 contributing buildings would remain intact and in their original location after implementation of the Project. The important configuration of buildings, spatial relationships and circulation patterns that are characteristic of the Columbia Studios era and contribute to the historic character of the site would also remain after implementation of the Project. Therefore, as concluded in Historical Resources Report, the proposed removal of contributing buildings to the potential historic district would not reduce the integrity of the potential historic district such that it can no longer convey its historic significance[18]. Therefore, removal of contributing buildings caused by the Project would not result in significant impacts to historical resources (i.e., the potential historic district). Notwithstanding, mitigation measures are included to ensure the protection and proper maintenance of the potential historic district during and after implementation of the Project.

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[16] *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution. Appendix D, South Coast Air Quality Management District, August 2003.*

[17] *It should be noted that the Sunset Gower Studios lot is a private property with controlled access and is not open to the public.*

[18] *Refer to page 117 of the Historical Resources Report included in Appendix C of this Draft EIR.*

With regard to individual historical resources, as discussed in Section IV.C, Cultural Resources, of this Draft EIR, the Project would demolish the United Recording Building at 6050 Sunset Boulevard which is eligible for listing in the National Register, California Register, and as a Los Angeles Historic-Cultural Monument for its associations with the music recording industry in Los Angeles. Due to the demolition of 6050 Sunset Boulevard, the Project would cause a substantial adverse change in the significance of an historical resource. Impacts to this historical resource would be significant and unavoidable even with implementation of the proposed mitigation measures.

(3) Noise (Construction Noise and Vibration)

(a) Construction Noise

As discussed in Section IV.H, Noise, of this Draft EIR, implementation of Mitigation Measure NOI-MM-1 would reduce the Project's construction noise levels to the extent feasible. Specifically, implementation of Mitigation Measure NOI-MM-1 (installation of temporary sound barrier) would reduce the noise generated by on-site construction activities at the off-site sensitive uses, by a minimum 15 dBA at the residential use on Gordon Street east of the Project Site (receptor location R1) and by a minimum 12 dBA at the residential use on Fountain Avenue south of the Project Site (receptor location R2). The estimated construction-related noise levels at off-site sensitive receptor location R2 would be reduced to below a level of significance with implementation of Mitigation Measure NOI-MM-1. With the implementation of Mitigation Measured NOI MM-1, the construction-related noise at receptor location R1 would still exceed the significance threshold by 2.5 dBA. Therefore, construction noise impacts associated with on-site noise sources would be significant and unavoidable. Cumulative impacts from on-site construction noise and related projects would be less than significant.

With respect to off-site noise (i.e. construction and operation traffic), the dominate noise would be due to construction truck traffic. As indicated in Table IV.H-13, in Section IV.H, Noise, of this Draft EIR, the estimated noise level from off-site construction traffic along Gordon Street, Fountain Avenue, and Gower Street would be 72.2 dBA, 67.9 dBA and 67.2 dBA, respectively. In addition, the estimated composite off-site traffic (including Project construction, interim Project traffic, and existing ambient) noise level along Gordon Street, Fountain Avenue, and Gower Street, during concurrent Project construction and operation would be approximately 73.8 dBA, 73.7 dBA, and 73.1 dBA, which would exceed the 66.1 dBA significance threshold along Gordon Street and the 71.2 dBA significance threshold along Fountain Avenue and Gower Street. There are no feasible mitigation measures to reduce the temporary significant noise impacts associated with the off-site construction trucks. As such, Project-level noise impacts from off-site construction would be significant and unavoidable. Cumulative noise impacts from off-site construction and construction of the related projects would also be significant and unavoidable.

(b) Construction Vibration

With implementation of Mitigation Measure NOI-MM-2 and compliance with LAMC Section 91.3307, vibration levels at the exterior of the on-site historic buildings would not exceed the significance criteria of 0.12 PPV for building damage. Therefore, vibration impacts, pursuant to the threshold for building damage, associated with the on-site construction activities would be reduced to a less-than-significant level. However, Project-level vibration impacts from on-site construction activities would still exceed the 72-VdB significance criteria for human annoyance at the residential use east and south of the Project Site (receptor locations R1 and R2). Other mitigation measures considered to reduce vibration impacts from on-site construction activities with respect to human annoyance included the installation of a wave barrier, which is typically a trench or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise). However, wave barriers must be very deep and long to be effective and are not considered cost effective for temporary applications, such as construction.[19] In addition, constructing a wave barrier to reduce the Project's construction-related vibration impacts would, in and of itself, generate ground-borne vibration from the excavation equipment. Thus, it is concluded that there are no feasible mitigation measures that could be implemented to reduce the temporary vibration impacts from on-site construction associated with human annoyance to a less-than-significant level. Therefore, Project-level vibration impacts from on-site construction activities with respect to human annoyance would remain significant and unavoidable.

With regard to off-site construction vibration, vibration levels generated by construction trucks (i.e., haul, delivery, and concrete trucks) along the Project's haul route (i.e., Sunset Boulevard, Gordon Street, Fountain Avenue, and Gower Street) would be below the significance criteria for building damage. Therefore, vibration impacts with respect to building damage would be less than significant. Project-related vibration levels from construction trucks would not exceed the significance criteria for human annoyance at sensitive receptors (e.g., residential and hotel uses) along Sunset Boulevard, Gordon Street, Fountain Avenue, and Gower Street. Therefore, Project-level vibration impacts from off-site construction with respect to human annoyance would also be less than significant. Cumulative off-site vibration impacts with respect to building damage and human annoyance would be less than significant.

[19] *Caltrans, Transportation- and Construction-Induced Vibration Guidance Manual, June 2004.*

11. Project Design Features

a. Air Quality

Project Design Feature AIR-PDF-1: Where power poles are available, electricity from power poles and/or solar powered generators rather than temporary diesel or gasoline generators shall be used during construction.

b. Greenhouse Gas Emissions

Project Design Feature GHG-PDF-1: The design of the new buildings shall incorporate features of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) program to be capable of meeting the standards of LEED Silver or equivalent green building standards under LEED v4. Specific sustainability features that are integrated into the Project design to enable the Project to achieve LEED® Silver certification will include, but are not limited to the following:

a. Use of Energy Star–labeled appliances (e.g., refrigerators, air conditioners, and water heaters) consistent with CCR Title 20 (Appliance Efficiency Regulations);

b. Reduced indoor water use by at least 20 percent;

c. Plumbing fixtures (water closets and urinals) and fittings (faucets) that exceed the performance requirements specified in the Los Angeles Municipal Code; and

d. Weather-based irrigation system and water-efficient landscaping with use of drought tolerant plants in up to 60 percent of the proposed landscaping.

c. Noise

Project Design Feature NOI-PDF-1: Power construction equipment (including combustion engines), fixed or mobile, shall be equipped with state-of-the-art noise shielding and muffling devices (consistent with manufacturers' standards). All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.

Project Design Feature NOI-PDF-2: All outdoor mounted mechanical equipment shall be enclosed or screened from off-site noise-sensitive receptors. The equipment screen shall be impermeable (i.e., solid material with minimum weight of 2 pounds per square feet) and break the line-of-sight from the equipment to the off-site noise-sensitive receptors.

Project Design Feature NOI-PDF-3: Outdoor amplified sound systems, if any, shall be designed so as not to exceed the maximum noise level of 85 dBA (Leq-1hr) at a distance of 25 feet from the amplified speaker sound systems at Level 1 plaza, courtyard and paseo, and upper levels courtyard and terraces, and 90 dBA (Leq 1hr) at Level 1 central plaza and Levels 6, 16 and 18 roof gardens. A qualified noise consultant shall provide written documentation that the design of the system complies with these maximum noise levels. The documentation shall be submitted during plan check for compliance.

Project Design Feature NOI-PDF-4: All loading docks shall be screened from off-site noise-sensitive receptors.

Project Design Feature NOI-PDF-5: Project construction shall not include the use of driven (impact) pile systems.

d. Public Services—Police Protection

Project Design Feature POL-PDF-1: During construction, the Applicant shall implement temporary security measures including security fencing, lighting, and locked entry.

Project Design Feature POL-PDF-2: The Project shall include a closed circuit camera system and keycard or guarded entry.

Project Design Feature POL-PDF-3: The Project shall provide proper lighting of buildings and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings.

Project Design Feature POL-PDF-4: The Project shall provide sufficient lighting of parking areas to maximize visibility and reduce areas of concealment.

Project Design Feature POL-PDF-5: The Project shall design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites.

Project Design Feature POL-PDF-6: Prior to the issuance of a building permit, the Applicant shall consult with LAPD's Crime Prevention Unit regarding the incorporation of feasible crime prevention features appropriate for the design of the Project, including applicable features in LAPD's Design Out Crime Guidelines.

Project Design Feature POL-PDF-7: Upon completion of the Project and prior to the issuance of a certificate of occupancy, the Applicant shall submit a diagram of the Project Site to the LAPD's Hollywood Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

e. Transportation

Project Design Feature TR-PDF-1: A detailed Construction Management Plan, including street closure information, a detour plan, haul routes, and a staging plan, would be prepared and submitted to the City for review and approval. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management Plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include, but not be limited to, the following elements, as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent streets.
- Temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities adjacent to Sunset Boulevard and Gordon Street, to ensure traffic safety on public rights-of-way. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety at the Project Site's driveways.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men).
- Schedule of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Containment of construction activity within the Project Site boundaries.
- Prohibition on construction-related vehicles/equipment parking on surrounding public streets.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate.
- Scheduling of construction-related deliveries, haul trips, etc., to occur outside commuter peak hours (after 7:00 A.M. or before 3:00 P.M.) to the extent feasible.
- Installation of appropriate traffic signs around the Project Site to ensure pedestrian, bicycle, and vehicle safety.

- No staging of hauling trucks on any streets adjacent to the Project, unless specifically approved as a condition of an approved haul route.
- Spacing of trucks so as to discourage a convoy effect.
- Sufficient dampening of the construction area to control dust caused by grading and hauling and reasonable control at all times of dust caused by wind.
- Securing of loads by trimming and watering or covering to prevent the spilling or blowing of the earth material.
- Cleaning of trucks and loads at the export site to prevent blowing dirt and spilling of loose earth.
- Maintenance of a log documenting the dates of hauling and the number of trips (i.e., trucks) per day available on the job site at all times.
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities. The telephone number shall be posted at the site readily visible to any interested party during site preparation, grading, and construction.

Project Design Feature TR-PDF-2: The Applicant shall implement a Transportation Demand Management (TDM) Program that will include but not be limited to the following transportation demand management measures:

- Educational Programs/On-Site TDM Coordinator who reaches out to employers and employees promoting the benefits of TDM;
- Centrally located Transportation Information Center/Kiosk where employees and visitors can obtain information regarding commute programs and real-time commuter information;
- Bicycle and pedestrian-friendly environment with exclusive access points, secured bicycle facilities, and showers;
- A one-time fixed-fee contribution of $75,000 to be deposited into the City's Bicycle Plan Trust Fund prior to the issuance of any certificates of occupancy to be used to implement bicycle improvements within the Project area;
- Ridesharing Services Program which would match employees together to establish carpools and vanpools;
- Guaranteed ride home (GRH) program;
- Short-term car rentals;

- Incentives for using alternative travel modes such as discounted monthly transit passes, carpool and vanpool preferential load/unload areas or designated parking spaces, a
- "parking cash-out" subsidy, and/or unbundled parking;
- Mobility Hub support of existing and/or future efforts by LADOT for Mobility Hubs by providing amenities such as bicycle parking and rentals, shared vehicle rentals, and transit information, etc. at the project site (subject to design feasibility);
- Make a one-time financial contribution of $75,000 to the City of Los Angeles Department of Transportation to be used in the implementation of the Mobility Hub in the general area of the Project;
- Project membership and participation in the Hollywood Community Transportation Management Organization (TMO) should the TMO become operational. The Hollywood TMO's services could replace some of the in-house TMO services where applicable, such as ridesharing matching services for multi-employee carpools and vanpools. Project representatives should attend organization meetings for the TMO, provide parking and travel demand data to the TMO, pay any established dues to the TMO, and make available information to project tenants relative to the services provided by the TMO. The TMO would offer similar services to those described above but would have a much wider reach than the project's local TDM plan and can result in much greater trip reduction benefits. The TMO's activities would help augment or implement some of the strategies described above for the project specific TDM plan;
- Record a Covenant and Agreement to ensure that the TDM program will be maintained.

f. Utilities and Service Systems—Water Supply and Infrastructure

Product Design Feature WAT-PDF-1: The Project design shall incorporate the following design features to support water conservation in excess of LAMC requirements.

- High Efficiency Toilets with a flush volume of 1.0 gallons per flush.
- Waterless urinals.
- High Efficiency Showerheads with a flow rate of 1.5 gallons per minute.

- Domestic Water Heating System located in close proximity to point(s) of use.
- Drip/Subsurface Irrigation (Micro-Irrigation).
- Bubblers for trees.
- Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together).
- Drought Tolerant Plants—60 percent of landscaped area.

12. Mitigation Measures

a. Air Quality

Mitigation Measure AIR-MM-1: During plan check, the Project representative shall make available to the lead agency or City of Los Angeles Department of Building and Safety and the South Coast Air Quality Management District a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that with the exception of demolition activities will be used during any portion of construction. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit's certified tier specification, Best Available Control Technology documentation, and California Air Resources Board or Air Quality Management District operating permit shall be available onsite at the time of mobilization of each applicable unit of equipment to allow the Construction Monitor to compare the on-site equipment with the inventory and certified Tier specification and operating permit. Off-road diesel-powered equipment within the construction inventory list described above shall meet the EPA Tier 4 Final standards where feasible

b. Cultural Resources

Mitigation Measure CUL-MM-1: The existing condition of Sunset Gower Studios shall be documented in accordance with Historic American Building Survey (HABS) guidelines and standards. Documentation shall include a historical narrative, existing drawings and plans, and photographs of the property, with special emphasis given to documentation of contributing resources and those resources that would be demolished as part of the Project. A qualified historic preservation professional shall be retained to oversee the preparation of HABS documentation.

Mitigation Measure CUL-MM-2: A Historic Resources Plan shall be developed for Sunset Gower Studios to document existing historic resources,

identify character-defining features and resources to be preserved, and establish a treatment plan for their continued preservation. Any future proposed rehabilitation or new additions to existing potential historic district contributors would be subject to specified guidelines and procedures set forth in the Historic Resources Plan that would identify and protect significant character-defining features and ensure that the proposed work conformed to the Secretary of the Interior's Standards.

Mitigation Measure CUL-MM-3: The Project shall include a multifaceted interpretive program, which will incorporate multiple mediums including physical interpretive exhibits and signage as well as an online component with digital media to document the history of the Sunset Gower Studios property and provides information and directions to access other interpretive features.

Mitigation Measure CUL-MM-4: The Project would include the development of a self-guided walking tour located along Gower Street, to be hosted on a web-based platform and accessible from mobile devices, which details the history of Columbia Pictures and the studio's association with the Sunset Gower property.

Mitigation Measure CUL-MM-5: A qualified historic preservation professional, who meets the requirements set forth by the Secretary of the Interior's Professional Qualifications Standards, shall be retained to ensure that Building A, Building B, and Building C are designed and constructed in accordance with the Secretary of the Interior's Standards for Rehabilitation to ensure that the proposed new construction shall be differentiated from existing construction and shall be compatible in design with Sunset Gower Studios in order to protect the historical integrity of the potential historic district and verify compliance with the Historic Resources Plan.

Mitigation Measure CUL-MM-6: The Project shall include a shoring plan to ensure the protection of adjacent historic resources during construction from damage due to underground excavation and general construction procedures and to reduce the possibility of settlement due to the removal of adjacent soil.

Mitigation Measure CUL-MM-7: A qualified archaeologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the archaeologist and shall depend on the rate of excavation and grading activities and the materials being excavated. If archaeological materials are encountered, the archaeologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The archaeologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the

recommendations of the evaluating archaeologist, and a copy of the archaeological survey report shall be submitted to the Department of City Planning. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist.

c. Paleontological Resources

Mitigation Measure PAL-MM-1: A qualified paleontologist shall be retained by the Applicant to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the paleontologist and shall depend on the rate of excavation and grading activities and the materials being excavated. If paleontological materials are encountered, the paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum and the Department of City Planning. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist.

d. Noise

Mitigation Measure NOI-MM-1: A temporary and impermeable sound barrier shall be erected, during Phase 1 and Phase 2 construction, at the locations listed below. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

- Along the eastern property line of the Project Site between the construction areas and the residential uses on the east side of Gordon Street east of the Project Site (receptor R1). The temporary sound barrier shall be designed to provide a minimum 15-dBA noise reduction at the ground level of receptor R1.
- Along the southern property line of the Project Site between the construction areas and residential use on Fountain Avenue south of the Project Site (receptor R2). The temporary sound barrier shall be designed to provide a minimum 12-dBA noise reduction at the ground level of receptor R2.

Mitigation Measure NOI-MM-2: Prior to start of construction, the Applicant shall retain the services of a structural engineer or qualified professional to visit the on-site historic buildings adjacent to the Project construction areas to inspect and document the apparent physical condition of the buildings' readily-visible features.

- The Applicant shall retain the services of a qualified acoustical engineer to review proposed construction equipment and develop and implement a vibration monitoring program capable of documenting the construction-related ground vibration levels at on-site historic buildings located within 20 feet of the Project construction activities, during demolition and grading/excavation phases. The vibration monitoring system shall continuously measure and store the peak particle velocity (PPV) in inch/second. The system shall also be programmed for two preset velocity levels: a warning level of 0.10 PPV and a regulatory level of 0.12 PPV. The system shall also provide real-time alert when the vibration levels exceed the two preset levels.
- The vibration monitoring program shall be submitted to the Department of Building and Safety (DBS) for review and approval, prior to start of construction activities.
- In the event the warning level (0.10 PPV) is triggered, the contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level, including but not limited to halting/staggering concurrent activities and utilizing lower vibratory techniques.
- In the event the regulatory level (0.12 PPV) is triggered, the contractor shall halt the construction activities in the vicinity of the building and visually inspect the building for any damage. Results of the inspection must be logged. The contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level. Construction activities may then restart.
- The recorded vibration levels and inspection logs shall be submitted to DBS for verification.

13. Summary of Alternatives

This Draft EIR examined four alternatives to the Project in detail, which include the No Project/No Build Alternative, the Preservation and Soundstage Alternative, the Reduced Excavation Alternative, and the Reduced Intensity Alternative. A general description of these alternatives is provided below. Refer to Section V, Alternatives, of this Draft EIR for a more detailed description of these alternatives, a comparative analysis of the impacts of

these alternatives with those of the Project, and a description of the alternatives considered but rejected as infeasible.

a. Alternative 1: No Project/No Build Alternative

In accordance with the CEQA Guidelines, the No Project Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states in part that, "in certain instances, the No Project Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for the purposed of this analysis, Alternative 1, the No Project/No Build Alternative, assumes that the Project would not be approved, and no new development would occur within the Project Site. Thus, the physical conditions of the Project Site would generally remain as they are today and the existing uses would remain on the Project Site. While the No Project/No Build Alternative would avoid all the Project's significant environmental impacts, it would not meet the underlying purpose of the Project. Additionally, the CEQA Guidelines state that should it be determined that the No Project/No Build Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives.

b. Alternative 2: Preservation and Soundstage Alternative

Alternative 2, the Preservation and Soundstage Alternative would develop the Project Site similar to the Project as it relates to the development of Building A and Building B. However, Alternative 2 would preserve the United Recording Building, located at 6050 Sunset Boulevard, by relocating the building to the interior of the Project Site. As detailed in Section IV.C, Cultural Resources, of this Draft EIR, the United Recording Building is a historic resource. Alternative 2 would reallocate a portion of the floor area proposed under the Project as part of Building A to accommodate the development of the two new soundstages and production support space (Building D and Building E). As such, Building A would be reduced in height by three floors and approximately 60 feet and would be approximately 240 feet in height. In addition, Alternative 2 would increase the height of Building B by approximately two floors and approximately 48 feet and would be approximately 137 feet in height. Building C, as proposed by the Project, would be eliminated. To accommodate the relocation of the United Recording Building within the Project Site, four existing buildings (Building 43, Building 48, Building 49, and Building 50) would be removed. Of these buildings proposed to be removed, Building 49 is a contributor to the potential historic district[20]. Contributing buildings number 38 and 42,

[20] *It should be noted that the building's integrity is considered fair.*

proposed to be removed by the Project, would be retained as part of Alternative 2. Building 08/09 and Building 9 proposed to be removed by the Project would also be retained as part of the Preservation and Soundstage Alternative. When considering the existing buildings proposed to be removed as part of Alternative 2, which would total 130,169 square feet, as compared to the Project's 160,611 square feet proposed for removal, Alternative 2 would result in a net increase of 489,773 square feet of new floor area on the Project Site (compared to the Project's net increase of 467,346 square feet of new floor area).

Parking would be provided similar to the Project as it relates to providing parking below the existing basecamp and below Building A. Specifically, the Preservation and Soundstage Alternative proposes to provide a total of 1,244 new spaces as follows: (1) up to 629 spaces within four subterranean parking levels below the existing basecamp and Building E; (2) up to 336 spaces within four subterranean parking levels below Building D; and (3) up to 279 spaces within three subterranean levels below Building A. In addition, Alternative 2 would relocate the bicycle parking facility with bicycle parking spaces, restrooms, and showers to an area within the garage below basecamp.

As with the Project, Alternative 2 would create a variety of landscaped gathering areas to enhance the existing pedestrian environment internal to the Project Site, including a paseo, a central plaza area, courtyards, and roof gardens and terraces. These areas would include trees, accent paving, seating, and other landscaping features throughout the Project Site.

As with the Project, the timing of construction of specific elements of Alternative 2 would depend on the business needs at the time. In addition, construction of Alternative 2 could also occur in phases, with construction potentially commencing as late as 2024, if not before, and buildout completed by 2028. Similar to the Project, construction activities would include demolition of existing uses, grading and excavation, and construction of new structures and related infrastructure. Due to the additional level of subterranean parking to be provided as part of Alternative 2, the amount of soil export for Alternative 2 would increase from approximately 280,000 cubic yards to approximately 316,500 cubic yards.

As with the Project, Alternative 2 would require a Major Development Project Conditional Use Permit for a Major Development Project; Conditional Use Permit to permit FAR Averaging in Unified Developments; a Commercial Corner Development Conditional Use Permit to permit a Commercial Corner Development; Site Plan Review, and a Vesting Tentative Tract Map.

c. Alternative 3: Reduced Excavation Alternative

Alternative 3, the Reduced Excavation Alternative, would eliminate the third level of subterranean parking under Building A and Basecamp proposed by the Project. In

addition, the number of parking spaces in the subterranean parking levels below Basecamp would be reduced. Specifically, Alternative 3 would reduce the number of new parking spaces provided as part of the Project by approximately 550 spaces. The remaining Project components would remain as proposed by the Project.

As with the Project, Alternative 3 would develop three new buildings comprising 627,957 square feet of floor area, including 478,851 square feet of creative office space within Building A, 68,638 square feet of creative office and production support space within Building B, 79,018 square feet of creative office and production support space within Building C, and 1,450 square feet for a bicycle parking facility. As with the Project, Alternative 3 would remove 160,611 square feet of existing floor area, resulting in a net increase of approximately 467,346 square feet of floor area. Like the Project, Building A under Alternative 3 would be 18 stories with a height of 300 feet, Building B would be five stories with a height of approximately 89 feet, and Building C would be six stories with a height of approximately 89 feet.

As with the Project, Alternative 3 would create a variety of landscaped gathering areas to enhance the existing pedestrian environment internal to the Project Site, including a paseo, a central plaza area, courtyards, and roof gardens and terraces. These areas would include trees, accent paving, seating, and other landscaping features throughout the Project Site.

Similar to the Project, construction of Alternative 3 could be developed in multiple phases. However, as Alternative 3 would remove one level of subterranean parking under both Building A and Basecamp, Alternative 3 would result in a reduction in excavation and export compared to the Project. As such, construction activities and the construction period would be reduced compared to the Project.

As with the Project, Alternative 3 would require a Conditional Use Permit for a Major Development Project; Conditional Use Permit to permit FAR Averaging in Unified Developments; Conditional Use Permit to permit a Commercial Corner Development; Vesting Tentative Tract Map; Site Plan Review; Haul Route approval; and demolition, grading, excavation, foundation, and associated building permits as required.

d. Alternative 4: Reduced Intensity Alternative

Alternative 4, the Reduced Intensity Alternative, would reduce the amount of total new floor area proposed by the Project by approximately 25 percent. Specifically, Alternative 4 would reduce the total floor area of Building A from 478,851 square feet to 321,850 square feet. The remaining components of the Project, including Building B, Building C, the bicycle parking facility, and parking garage would be provided as proposed by the Project. With the reduction in floor area of Building A proposed by Alternative 4, the

number of stories and height of Building A would be reduced from 18 stories to 13 stories with a height of 225 feet compared to the Project's height of 300 feet. Overall, Alternative 4 proposes the development of 470,956 square feet of floor area (a reduction of 157,001 square feet compared to the 627,957 square feet of floor area proposed by the Project). As with the Project, Alternative 4 would remove 160,611 square feet of existing floor area, resulting in a net increase of approximately 310,345 square feet of net new floor area on the Project Site (compared to the Project's 467,346 square feet of net new floor area).

Parking under Alternative 4 would be constructed similar to the Project and would include 1,335 new spaces as follows: (1) up to 525 spaces within a new parking structure with six above-grade levels and three subterranean parking levels; (2) up to 531 spaces within three subterranean parking levels below the existing basecamp and below a proposed 1,450-square-foot bicycle parking facility; and (3) up to 279 spaces within three subterranean levels below Building A.

As with the Project, Alternative 4 would create a variety of landscaped gathering areas to enhance the existing pedestrian environment internal to the Project Site, including a paseo, a central plaza area, courtyards, and roof gardens and terraces. These areas would include trees, accent paving, seating, and other landscaping features throughout the Project Site.

Similar to the Project, construction of Alternative 4 would be developed in multiple phases and would include similar grading and excavation activities as the Project. However, given the reduction in uses, the construction period would be reduced compared to that of the Project.

As with the Project, Alternative 4 would require a Conditional Use Permit for a Major Development Project; Conditional Use Permit to permit FAR Averaging in Unified Developments; Conditional Use Permit to permit a Commercial Corner Development; Vesting Tentative Tract Map; Site Plan Review; Haul Route approval; and demolition, grading, excavation, foundation, and associated building permits as required.

e. Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should it be determined that the No Project/No Build Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives.

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project/No Build Alternative would avoid all of the Project's significant environmental impacts. However, the No Project/No Build Alternative would not meet any of the Project's basic objectives.

However, in accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that Alternative 2, the Preservation and Soundstage Alternative, would be the Environmentally Superior Alternative. As discussed in Section V. Alternatives, of this Draft EIR, while Alternative 2 would not eliminate the Project's significant and unavoidable impacts with regard to regional construction emissions and on- and off-site construction noise, Alternative 2 would eliminate the Project's significant and unavoidable impact with regard to historical resources. In addition, Alternative 2 would reduce many of the Project's less-than-significant and less than significant with mitigation impacts compared to the other alternatives. Thus, of the range of alternatives analyzed, Alternative 2 would be the Environmentally Superior Alternative.