

Appendices

Appendix FEIR-1

Draft EIR Comment Letters



Erin Strellich <erin.strellich@lacity.org>

SCH # 2023020196-East End Studios ADLA

2 messages

Lin, Alan S@DOT <alan.lin@dot.ca.gov>

Mon, Sep 9, 2024 at 4:54 PM

To: OPR State Clearinghouse <State.Clearinghouse@opr.ca.gov>, "Erin.Strellich@lacity.org" <Erin.Strellich@lacity.org>

To Whom It May Concern,

Attached please find the Caltrans comment letter!

Thank you for the opportunity to review this comment!

Alan Lin, P.E.

Transportation Engineer, Civil

LDR, Division of Planning

State of California

Department of Transportation

Mail Station 16

[100 South Main Street](#)

[Los Angeles, CA 90012](#)

[213-269-1124 Mobile](#)

 **LA-2023-04586 East End Studios ADLA-DEIR.pdf**
238K

Erin Strellich <erin.strellich@lacity.org>

Tue, Sep 10, 2024 at 11:55 AM

To: "Lin, Alan S@DOT" <alan.lin@dot.ca.gov>

Cc: OPR State Clearinghouse <State.Clearinghouse@opr.ca.gov>

Received, thanks Alan!



Erin Strellich

Pronouns: She, Her, Hers

City Planning Associate

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Note: Out of the office on alternating Mondays

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DEPARTMENT OF TRANSPORTATION

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*Making Conservation
a California Way of Life*

September 9, 2024

Erin Strelch
Department of City Planning
City of Los Angeles
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012

RE: East End Studios ADLA
SCH # 2023020196
Vic. LA-101/PM S0.204, LA-10/PM 17.13,
LA-5/PM 17.03
GTS # LA-2023-04586-DEIR

Dear Erin Strelch,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced DEIR. The East End Studios ADLA Project involves the development of a new multi-story production studio campus totaling 675,611 square feet of floor area on an approximately 14.6-acre (635,551 net square-foot) site. The Project would include 299,012 square feet of studio uses within five studio buildings; 69,192 square feet of production support space within three covered areas, adjacent to the studio buildings; and 307,407 square feet of office use within two five-story buildings. Up to 8,000 square feet of ground floor areas within the office buildings could be utilized as retail space, including up to 4,000 square feet of restaurant space, or as additional common areas for the office tenants. Two existing warehouse structures totaling approximately 311,000 square feet would be demolished.

The Project Site is located within 0.25 miles of a Major Transit Stop and bus stop at Central Street & 6th Street which is served by the Los Angeles County Metropolitan Transit Authority (Metro) Lines 16, 18, 53, 60, 62, and 720. Additionally, the Project Site is located approximately 0.85 miles south of the Metro Little Tokyo/Arts District Station, which serves the A and E Lines. The A Line travels between Azusa and Long Beach and the E Line travels between Santa Monica and East Los Angeles.

The project is expected to generate approximately 3,815 daily vehicle trips, totaling 27,985 daily vehicle miles traveled (VMT). This results in a daily work VMT per employee of 5.5, which is below the Central APC's significance threshold of 7.6 VMT per employee. Therefore, the project would not cause a significant impact regarding work VMT per employee, as estimated by the VMT Calculator.

The project will include carpool/vanpool loading areas, walkways between buildings, and public sidewalks. It will provide pedestrian connectivity within the site and to surrounding areas through walkways between buildings across all locations. Additionally, the project will implement transportation demand management (TDM) measures for visitors and employees, such as a reduced parking supply and 68 short-term and 105 long-term bicycle parking spaces.

The Project Design Features (PDFs) that contribute to reducing the project's VMT are outlined below and have been incorporated into the VMT Calculator:

1. Parking
2. Transit
3. Education and Encouragement
4. Commute Trip Reductions
5. Shared Mobility
6. Bicycle Infrastructure
7. Neighborhood Enhancement

Each of these TDM strategies has been empirically shown to reduce trip generation or influence mode choice, effectively lowering VMT. We recommend the following additional TDM measures for the City's consideration:

1. Limit Parking Supply
2. Provide Traffic Calming Features
3. Encourage Remote Work and Telecommuting

For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). This reference is available online at:

<http://ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

The project's Transportation Analysis includes an evaluation of the following Caltrans facilities in the study area where the project would add 25 or more peak hour trips to the off-ramps:

- I-10 Eastbound Off-Ramp to Porter Street
- I-10 Westbound Off-Ramp to Mateo Street/Enterprise Street
- I-10 Westbound Off-Ramp to 8th Street

As stated on page 96 of Appendix I Transportation, Table 14 Queuing Analysis for Future Conditions (Year 2026) has been completed. However, a queuing analysis for both Existing without Project Condition and Existing with Project Condition should also be

provided. Additionally, the report should clarify whether actual signal timing for the Existing condition was obtained from Caltrans/City of Los Angeles.

For this new development, a post-development VMT analysis to validate and justify Project VMT and future VMT threshold setting may be considered and prepared. Additional mitigation measures should be implemented if the post-development VMT analysis discloses any significant impacts. This analysis, which may include interviews with and surveys of project occupants, will provide new data to help validate the City's VMT model results.

The collected data can include, among other things, where the trips are coming from, when the trips are taking place, what transportation mode is used, and why those transportation modes were selected. This survey data would be useful 1) to validate existing VMT threshold, 2) to assist in setting future VMT threshold, and 3) to identify suitable TDM to apply as minimization or mitigation measures for the future. These measures could be implemented in the event the post-development VMT analysis discloses any significant impacts.

Construction activities could interfere with pedestrian, bicycle, transit, or vehicle circulation and accessibility to adjoining areas. When preparing a detailed Construction Traffic Management Plan (CTMP), the following elements should also be included:

- Advance notification to adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of construction.
- Pedestrian/bicycle connections to the bus stops shall remain unblocked. If a bus stop is temporarily relocated during construction, advance notification of relocated stop shall be provided to the public.
- Any transportation of heavy construction equipment and/or materials that require the use of oversized transport vehicles on State highways will need a Caltrans transportation permit. Any large-size truck trips be limited to off-peak commute periods for the construction phase and operation phase. Construction truck loads should be covered with a tarpaulin cover.

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2023-04586-DEIR.

Sincerely,



ANTHONY HIGGINS
Acting LDR/CEQA Branch Chief

email: State Clearinghouse



Erin Strelich <erin.strelich@lacity.org>

South Coast AQMD staff's comments on the Draft EIR for the Proposed East End Studios ADLA Project (ENV-2022-5830-EIR)

2 messages

Danica Nguyen <dnguyen1@aqmd.gov>
To: Erin Strelich <erin.strelich@lacity.org>
Cc: Sam Wang <swang1@aqmd.gov>

Wed, Aug 28, 2024 at 9:04 AM

Dear Erin Strelich,

Attached are South Coast AQMD staff's comments on the Draft Environmental Impact Report (EIR) for the **Proposed East End Studios ADLA Project (ENV-2022-5830-EIR)** (SCH No.: **2023020196**) ([South Coast AQMD Control Number: LAC240801-09](#)). Please contact me if you have any questions regarding these comments.

Regards,

Danica Nguyen

Air Quality Specialist, CEQA-IGR

Planning, Rule Development & Implementation

South Coast Air Quality Management District

[21865 Copley Drive, Diamond Bar, CA 91765](#)

Phone: (909) 396-3531

E-mail: dnguyen1@aqmd.gov

Please note South Coast AQMD is closed on Mondays.

 **LAC240801-09 DEIR East End Studios ADLA Project.pdf**
125K

Erin Strelich <erin.strelich@lacity.org>
To: Danica Nguyen <dnguyen1@aqmd.gov>
Cc: Sam Wang <swang1@aqmd.gov>

Thu, Aug 29, 2024 at 8:47 AM

Received - thank you. I'll reach out again if we have questions.

8/29/24, 8:47 AM

City of Los Angeles Mail - South Coast AQMD staff's comments on the Draft EIR for the Proposed East End Studios ADLA Project (...)



Erin Strelch

Pronouns: She, Her, Hers

City Planning Associate

Los Angeles City Planning

221 N. Figueroa St., Suite 1350

Los Angeles, CA 90012

T: (213) 847-3626 | Planning4LA.org



Note: Out of the Office on alternating Mondays

Effective July 1, 2024, City Planning fees will increase by 3.5% based on the Consumer Price Index for Urban Consumers (CPI-U). To view the updated Fee Schedule, [see here](#).

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South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

August 28, 2024

Erin.Strelich@lacity.org

Erin Strelich, City Planning Associate
City of Los Angeles, Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012

**Draft Environmental Impact Report (EIR) for the Proposed
East End Studios ADLA Project (Proposed Project)
(SCH No.: 2023020196)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Los Angeles is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff (Staff) has provided a brief summary of the project information and prepared the following comments organized by topic of concern.

South Coast AQMD Staff's Summary of Project Information in the Draft EIR

Based on the Draft EIR, the Proposed Project will develop a multi-story production studio campus totaling 657,611 square feet (sq. ft) on an approximately 14.6-acre site.¹ The Proposed Project would include²:

- 299,012 sq. ft of studio uses with five buildings,
- 69,192 sq. ft of production support space,
- 307,407 sq. ft of office use,
- Up to 8,000 sq. ft can be used as retail space,
- Up to 4,000 sq. ft of restaurant space,
- Demolition of two existing warehouses totaling approximately 311,000 sq. ft

The Proposed Project is located at 1206-1338 East 6th Street, 1205-1321 Wholesale Street, 1210-1361 Produce Street, 635 and 639 Mill Street, and 640 South Alameda Street.³ Based on the aerial photograph, Staff found that the nearest sensitive receptor (e.g., elementary school) is less than 500 feet south of the Proposed Project. The construction is anticipated to begin in 2024 and be completed in 2026.⁴

¹ Draft EIR. Page II-1.

² Ibid.

³ Ibid.

⁴ Ibid. Page II-20.

South Coast AQMD Staff's Comments on the Draft EIR*South Coast AQMD Air Permits and Role as a Responsible Agency*

Based on the Draft EIR, the Proposed Project would include standby diesel generators and spray booths.⁵ Thus, air permits from South Coast AQMD will be required, and the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD. CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of evaluating the applications for air permits. For these reasons, the Final EIR should include a discussion about any new stationary and portable equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project.

The Final EIR should also include calculations and analyses for construction and operation emissions for the new stationary and portable sources, as this information will also be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SW:DN

LAC240801-09

Control Number

⁵ Ibid.



Erin Strelch <erin.strelch@lacity.org>

CEQA letter completed: East End Studios ADLA - NOC & NOA of dEIR

2 messages

Albert Lew <albert.lew@lacity.org>
To: Erin Strelch <erin.strelch@lacity.org>

Mon, Sep 9, 2024 at 8:00 AM

Please find attached the official response. Contact us if you have any questions.

Regards,
Albert C. Lew, P.E., C.S.P.
Wastewater Engineering Services Division (WESD)
Bureau of Sanitation
Department of Public Works
City of Los Angeles
Phone: 323.342.6207
Fax: 323.342.6210



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111K

Erin Strelch <erin.strelch@lacity.org>
To: Albert Lew <albert.lew@lacity.org>

Mon, Sep 9, 2024 at 9:09 AM

Received, thank you!



Erin Strelch
Pronouns: She, Her, Hers
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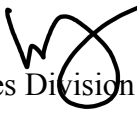
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CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

DATE: August 21, 2024

TO: Vincent P. Bertoni, Director of Planning
Department of City Planning

Attn: Erin Strelch, City Planner
Department of City Planning

FROM: Rowena Lau, Division Manager 
Wastewater Engineering Services Division
LA Sanitation and Environment

**SUBJECT: EAST END STUDIOS ADLA PROJECT - NOTICE OF COMPLETION
AND AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT**

This is in response to your July 25, 2024 Notice of Completion and Availability of Draft Environmental Impact Report for the proposed East End Studios ADLA Project located at 1206 East 6th St, Los Angeles, CA 90071. LA Sanitation, Wastewater Engineering Services Division has received and logged the notification. Upon review, there were no changes to the project and the previous response is valid. Please notify our office in the instance that additional environmental review is necessary for this project.

If you have any questions, please call Than Win at (323) 342-6268 or email at than.win@lacity.org.

RL/TW: em

c: Julie Allen, LASAN
Michael Scaduto, LASAN
Spencer Yu, LASAN
Than Win, LASAN



Erin Strellich <erin.strellich@lacity.org>

WSRCC - [City of Los Angeles, East End Studios ADLA] - Comment Letter

Shreyas Pingle <shreyasp@mitchtsailaw.com>

Mon, Sep 9, 2024 at 3:05 PM

To: erin.strellich@lacity.org

Cc: "Mitchell M. Tsai Attorney at Law, P.C." <info@mitchtsailaw.com>, Jeremy Herwitt <jeremyh@mitchtsailaw.com>

Good afternoon,

Please find attached the comment letter our office is submitting regarding the Draft EIR for the East End Studios ADLA Project (SCH 2023020196).

Please let us know if you have any questions or concerns. We would greatly appreciate confirmation of receipt.

Best Regards,
Shreyas

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Shreyas Pingle, Paralegal and Case Manager
Mitchell M. Tsai Law Firm - *Environmental and Land Use Litigation*
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202K

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Mitchell M. Tsai
Law Firm

139 South Hudson Avenue
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VIA E-MAIL

September 9, 2024

Erin Strelch
City of Los Angeles, Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012
Em: erin.strelch@lacity.org

**RE: City of Los Angeles' East End Studios ADLA Project – Draft
Environmental Impact Report (SCH 2023020196)**

Dear Ms. Strelch,

On behalf of the Western States Regional Council of Carpenters (“**Western Carpenters**” or “**WSRCC**”), my Office is submitting these comments for the City of Los Angeles' (“**City**”) Draft Environmental Impact Report (“**DEIR**”) (SCH No. 2023020196) for the East End Studios ADLA Project (“**Project**”).

WSRCC would like to express its support for this Project. After further reviewing this Project, WSRCC believes that the Project will benefit the environment and the local economy by practicing protocols that will protect worker health and safety and will incorporate adequate environmental mitigation.

Should the City have any questions or concerns, the City should feel free to contact my office.

Sincerely,

Jeremy Herwitt, Esq.
Attorneys for Western States Regional Council of Carpenters