V. Alternatives

V. Alternatives

1. Introduction

The identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process under CEQA. Specifically, Public Resources Code (PRC) Section 21002 states, in part, that the environmental review process is intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives which will avoid or substantially lessen such significant effects. In addition, PRC Section 21002.1(a) states, in part, that the purpose of an environmental impact report is to identify the significant effects on the environment of a project, identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.

Direction regarding the consideration and discussion of project alternatives in an EIR is provided in CEQA Guidelines Section 15126.6(a), as follows:

> *An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible.*

CEQA Guidelines Section 15126.6(b) states that the discussion of project alternatives must focus on those alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the proposed project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. CEQA Guidelines Section 15126.6(f) further directs that the range of alternatives required in an EIR is governed by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are addressed. In selecting project alternatives for analysis, potential alternatives must be feasible. CEQA Guidelines Section 15126.6(f)(1) states that:

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries […], and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site […]

Beyond these factors, CEQA Guidelines Section 15126.6(e) requires the analysis of a "no project" alternative, and CEQA Guidelines Section 15126.6(f)(2) requires an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. If the environmentally superior alternative is the "no project" alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives considered pursuant to CEQA Guidelines Section 15126.6(e)(2).

2. Overview of Selected Alternatives

As discussed above, the intent of the alternatives analysis is to avoid or substantially lessen any of the significant effects of the Project while still feasibly obtaining most of the basic Project objectives. As discussed in Section II, Project Description, of this Draft EIR, the Project's underlying purpose is to maintain Radford Studio Center as a studio and to modernize and enhance production facilities within the Project Site to accommodate both the existing unmet and anticipated future demands of the entertainment industry, keep production activities and jobs in Los Angeles, upgrade utility and technology infrastructure, and create a cohesive studio lot. To achieve this underlying purpose, the Project objectives are defined as follows:

- Ensure the Project Site retains existing studio uses and provide an expandable and flexible production platform including sound stages, production support, and office space regulated through the establishment of a Specific Plan to respond to evolving market demands and studio production needs while ensuring compatibility with applicable local and regional plans, specifically the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan.

- Establish clear guidelines to preserve historic elements of the studio while modernizing and expanding the studio to ensure its continued operational success in the future.

- Create a fully integrated studio campus that is capable of addressing the evolving demands of the media and entertainment industry, incorporates a mix of compatible and synergistic land uses, and ensures the Project is compatible with the immediate neighborhood by concentrating building heights away from Project Site edges.

- Optimize the currently underutilized Project Site to accommodate the existing unmet and anticipated future demands of the entertainment industry by providing new, state-of-the-art sound stages, production support facilities, production offices, and general offices, and upgraded on-site elements, such as circulation, staging, basecamp, outdoor production and parking areas, while remedying past haphazard building additions and prioritizing efficient production operations.

- Grow the local and regional economy by providing a wide range of entertainment and media-related jobs and keeping production jobs in Los Angeles.

- Enhance access through the provision of multiple safe, secure, and efficient entry points to the Project Site. Additionally, ensure the Project is consistent with the intent of the Los Angeles River Revitalization Master Plan, provides an enhanced public right-of-way to promote walkability, strengthens bicycle access, and fosters safety and connectivity in the local community.

- Provide multi-modal transportation solutions, including Project Mobility Hubs with services that are integrated with public transit lines and encourage alternative means of transportation and mobility.

- Enhance the identity of the Project Site as an iconic entertainment and media center by providing an architecturally distinct design and a creative signage program that reflects and complements the production, media, and entertainment uses on-site.

- Create a model of sustainability in modern production studio development and operations by committing to an all-electric development and integrating best management practices with regard to water, energy, and resource conservation.

Based on the analyses provided in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with respect to:

- **Air Quality**—Regional emissions of nitrogen oxides (NO_X) during construction;

- **Noise**—On-site noise during construction; off-site noise during construction associated with hauling activities and implementation of off-site improvements; and composite noise from on- and off-site construction activities; and

- **Vibration**—On-site vibration during construction and off-site vibration during construction associated with hauling activities and construction of off-site improvements (based on the significance threshold for human annoyance).

With regard to cumulative impacts, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with respect to:

- **Air Quality**—Regional emissions of NO_X during construction and during concurrent construction and operational activities;

- **Noise**—On-site noise impacts during construction and off-site noise impacts associated with haul route activities during construction; and

- **Vibration**—On-site vibration during construction and off-site vibration due to the off-site improvements (based on the significance threshold for human annoyance).

Under a potential long-term buildout scenario, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with respect to:[1]

- **Air Quality**—Project-level and cumulative impacts associated with emissions of NO_X due to concurrent construction and operations.

Based on the significant construction-related environmental impacts of the Project, the basic objectives established for the Project, and the feasibility of the various alternatives considered, the Project alternatives listed below were selected for evaluation:

- **Alternative 1—No Project/No Build Alternative:** Alternative 1 assumes that the Project would not be approved, no new permanent development would occur within the Project Site, and the existing environmental setting would be maintained. Under Alternative 1, the physical conditions of the Project Site would generally remain as they were at the time the Notice of Preparation (NOP) was published for the Project. Specifically, the existing buildings and uses, as well as the above-grade parking structures, would remain on the Project Site, and no new construction would occur beyond ongoing production activities.

- **Alternative 2—Development in Accordance with Existing Zoning Alternative:** Alternative 2 would involve buildout of the Project Site in accordance with the existing zoning and land use regulations for the Project Site. Under Alternative 2, new development would occur within the South Lot, and building heights would be increased within certain areas of the South Lot. Alternative 2 would include the construction of an estimated 1,820,875 square feet of new development, the demolition of 599,985 square feet of existing studio-related uses, and the retention of an estimated 579,125 square feet of existing studio-related uses. Thus, upon completion of construction, Alternative 2 would include a total of 2,400,000 square feet of development with a floor area ratio (FAR) of approximately 1.24:1. The 2,400,000 square feet would be comprised of 450,000 square feet of sound stages, 360,000 square feet of production support uses, 840,000 square feet of production office uses, 720,000 square feet of general office uses, and 30,000 square feet of

[1] *While Project buildout is anticipated in 2028, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2045.*

retail uses. Approximately 6,050 parking spaces would be provided. In addition, Alternative 2 would result in approximately 896,000 cubic yards of cut and 49,000 cubic yards of fill, resulting in approximately 847,000 cubic yards of export.

- **Alternative 3—Reduced Density Alternative:** Alternative 3 would involve a 25-percent reduction in the Project's proposed development program set forth in Section II, Project Description, of this Draft EIR, as shown in Table V-1 on page V-7. Alternative 3 would include a site plan that would be similar to that of the Project but with reduced grading and reduced building heights within certain areas of the Project Site. Alternative 3 would involve the construction of an estimated 1,065,939 square feet of new development, the demolition of 595,049 square feet of existing studio-related uses, and the retention of an estimated 584,061 square feet of existing studio-related uses. Upon completion, Alternative 3 would include a total of 1,650,000 square feet of development with a resulting FAR of approximately 0.85:1. The total of 1,650,000 square feet of floor area would be comprised of 340,000 square feet of sound stage, 240,000 square feet of production support uses, 540,000 square feet of production office uses, 515,000 square feet of general office uses, and 15,000 square feet of retail uses. Approximately 4,525 parking spaces would be provided under Alternative 3. In addition, under Alternative 3, approximately 605,000 cubic yards of cut, and approximately 55,000 cubic yards of fill would occur, resulting in the export of approximately 550,000 cubic yards of export.

- **Alternative 4—Reduced Excavation/Grading Alternative:** Alternative 4 would eliminate subterranean parking within the South Lot in order to reduce excavation and export. Alternative 4 would include the same development program and general layout as the Project, except all new parking within the South Lot would be located in at-grade surface lots and above-ground structures. As a result, building heights would increase in comparison to the Project with a maximum permitted building height of 175 feet. Alternative 4 would involve the same demolition and a similar retention of existing uses and the same FAR as the Project (i.e., 0.96:1). Excavation under Alternative 4 would extend to a maximum depth of approximately 25 feet and would include approximately 335,000 cubic yards of cut and approximately 55,000 cubic yards of fill, resulting in approximately 280,000 cubic yards of export. A total of approximately 6,050 vehicular parking spaces would be provided similar to the Project.

- **Alternative 5—Residential Mixed-Use Alternative:** Alternative 5 would involve a mixed-use development with studio, residential, office, and commercial uses. Alternative 5 would include the construction of 1,981,010 square feet of new development, the demolition of 646,120 square feet of existing studio-related uses, and the retention of 532,990 square feet of existing studio-related uses. Upon completion, Alternative 5 would provide a total of 2,514,000 square feet of development, resulting in an FAR of approximately 1.29:1. Total development upon completion would be comprised of 750,000 square feet of residential uses (743 units), 379,000 square feet of sound stages, 300,000 square feet of production support uses, 575,000 square feet of production office uses,

450,000 square feet of general office uses, and 60,000 square feet of retail uses. Alternative 5 would permit maximum building heights up to 150 feet, which is greater than the Project. Under Alternative 5, a total of approximately 5,856 vehicular parking spaces would be provided at full buildout. Alternative 5 would result in approximately 605,000 cubic yards of cut and approximately 55,000 cubic yards of fill, resulting in approximately 550,000 cubic yards of export.

Table V-1 on page V-7 provides a comparison of development associated with the Project and the five alternatives being considered. Each of these alternatives is described in more detail and evaluated in the sections that follow. In addition, CEQA Guidelines Section 15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible, and such rejected alternatives are described below.

Table V-1
Summary Comparison of Development Proposed under the Project and Alternatives

Development Component	Proposed Development Program	Alternative 1: No Project/ No Build Alternative	Alternative 2: Development in Accordance with Existing Zoning Alternative	Alternative 3: Reduced Density Alternative	Alternative 4: Reduced Excavation/ Grading Alternative	Alternative 5: Residential Mixed-Use Alternative
Floor Area Upon Completion						
Sound Stage	450,000 sf	359,730 sf	450,000 sf	340,000 sf	450,000 sf	379,000 sf
Production Support	300,000 sf	255,510 sf	360,000 sf	240,000 sf	300,000 sf	300,000 sf
Production Office	725,000 sf	450,060 sf	840,000 sf	540,000 sf	725,000	575,000 sf
General office	700,000 sf	113,810 sf	720,000 sf	515,000 sf	700,000 sf	450,000 sf
Retail	25,000 sf	—	30,000 sf	15,000 sf	25,000 sf	60,000 sf
Residential	—	—	—	—	—	750,000 sf (743 units)
Total Floor Area Upon Completion	**2,200,000 sf**	**1,179,110 sf**	**2,400,000 sf**	**1,650,000 sf**	**2,200,000 sf**	**2,514,000 sf**
Existing Floor Area	**1,179,110 sf**	**1,179,110 sf**	**1,179,110 sf**	**1,179,110 sf**	**1,179,110 sf**	**1,179,110 sf**
Demolition	646,120 sf	—	599,985 sf	595,049 sf	646,120 sf	646,120 sf
Existing Floor Area to Remain	532,990 sf	1,179,110 sf	579,125 sf	584,061 sf	532,000 sf	532,990 sf
New Construction	1,667,010 sf	—	1,820,875 sf	1,117,010 sf	1,667,010 sf	1,934,875 sf
Net Change in Floor Area	**+1,020,890 sf**	**0**	**+1,220,890 sf**	**+470,890 sf**	**+1,020,890 sf**	**+1,334,890 sf**
FAR Upon Completion	**0.96:1**	**0.61:1**	**1.24:1**	**0.85:1**	**1.13:1**	**1.29:1**
Parking Provided	6,050 sp	3,095 sp	6,050 sp	4,525 sp	6,050 sp	5,856 sp
Maximum Permitted Height	135 ft	Unlimited[a]	Unlimited[a]	105 ft	175 ft	150 ft
Maximum Depth of Excavation	50 ft	—	50 ft	50 ft	25 ft	50 ft
Soil Export	880,000 cy	—	847,000 cy	550,000 cy	280,000 cy	550,000 cy

cy = cubic yards

Table V-1 (Continued)
Summary Comparison of Development Proposed under the Project and Alternatives

Development Component	Proposed Development Program	Alternative 1: No Project/ No Build Alternative	Alternative 2: Development in Accordance with Existing Zoning Alternative	Alternative 3: Reduced Density Alternative	Alternative 4: Reduced Excavation/ Grading Alternative	Alternative 5: Residential Mixed-Use Alternative
du = dwelling units						
FAR = floor area ratio						
ft = feet						
sp = spaces						
sf = square feet						
[a] *Portions of the Project Site currently in an M Zone situated within 199-feet of the OS Zone are subject to transitional height pursuant to Section 12.21.1 A.10 of the LAMC.*						
Source: Eyestone Environmental and Skidmore, Owings and Merrill, 2024.						

3. Alternatives Considered and Rejected as Infeasible

As set forth in CEQA Guidelines Section 15126.6(c), the range of potential alternatives to a proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant impacts. As further set forth in CEQA Guidelines Section 15126.6(c), the EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should specifically identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate an alternative from detailed consideration are the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Based on the CEQA Guidelines, alternatives to the Project that have been considered and rejected include the following:

- **Alternative Site:** The objectives of the proposed Project are closely tied to the Project's underlying purpose to modernize and enhance production facilities within the Project Site to accommodate both the existing unmet and anticipated future demands of the entertainment industry, keep production activities and jobs in Los Angeles, upgrade utility and technology infrastructure, and create a cohesive studio lot. To meet the Project's objectives, including those that provide an expandable and flexible production platform related to sound stages, production support, and office space to respond to evolving market demands and studio production needs, and to create a fully integrated studio campus that incorporates a synergistic mix of compatible uses on and underutilized site, the Applicant has identified improvements that are needed to bring the existing studio in line with modern production techniques and trends and to accommodate the unmet demand for production space in Los Angeles. Many of the existing production facilities on-site have been developed in an ad hoc manner over the years, resulting in inefficiencies and space constraints. Additionally, several of the existing sound stages on the Project Site are too small and outdated for the needs of the current market and technology and on-site elements, such as circulation, staging, basecamp, outdoor production and parking areas are in need of upgrade.

  Modern production techniques call for more integrated, campus-like settings with additional spaces, including gathering, support, office, and post-production spaces, as much of the production work today is performed during post-production using specialized digital facilities for editing and adding digital effects, graphics, special effects, sound, etc. Modern production space also requires production-related land uses in different ratios today than in the past due to the changing nature of the production process. Production facilities now use high-tech equipment and techniques to enhance quality and substitute virtual space for what was previously done with physical models or other cinematic techniques. Also,

new media is continuously being created to enhance the entertainment experience, such as virtual media, online entertainment, and video games. Modern media production calls for new types of post-production spaces, increased office space, and integrated gathering spaces that foster collaboration and information exchange across the multitude of disciplines that comprise the modern studio.

The Project Site is currently used for studio uses. An alternative site of similar size and existing zoning that would allow a studio use within a similar urban infill area is not known to be available. In addition, development on an alternative site would result in no changes to existing on-site conditions, which would, therefore, provide no potential to achieve the basic Project objectives related to providing an expandable and flexible production platform; creating a fully integrated campus that addresses the evolving demands of the studio industry; incorporating a mix of synergistic uses; optimizing the currently underutilized Project Site; addressing needed upgrades to the Project Site; growing the local and regional economy; enhancing access to the Project Site and vicinity; incorporating Mobility Hubs and other TDM elements; enhancing the architectural design of the Project Site; and incorporating modern sustainability features. Furthermore, development on an alternative site would split studio operations into two locations, which would substantially reduce operational efficiency and functionality and increase vehicle miles traveled (VMT) and related air quality and GHG impacts. Additionally, the financial and practical implausibility of locating and securing an alternative site of similar size and use would render the alternative approach infeasible.

As all of the Project's significant and unavoidable impacts are related to construction activities, development on another site would not avoid or substantially lessen the Project's significant impacts. It is anticipated that development on an alternative site would still produce significant construction-related air quality, noise, and vibration impacts similar to the Project, albeit in a different location. Moreover, depending on localized and site-specific conditions, development at another location could result in additional significant impacts, such as new traffic impacts in an area where transit options are not as readily available. Depending on surrounding uses, a greater number of sensitive receptors may also be affected. Finally, the Applicant already owns the Project Site, and it is not reasonable to assume that Radford Studio Center's operations could be feasibly divided and transferred to another site.

Based on the above, an alternative site is not considered feasible as it would fail to achieve the Project's underlying purpose or basic project objectives. In addition, the development of an alternative site would not avoid or substantially lessen the Project's significant impacts. Thus, in accordance with Section 15126.6(f) of the CEQA Guidelines, this alternative was rejected from further consideration.

- **Alternatives that Eliminate the Project's On-Site Construction Noise and Vibration Impacts:**

– As shown in Table IV.K-28 in Section IV.K, Noise, of this Draft EIR, the estimated on-site construction noise levels with implementation of mitigation measures, including the installation of a sound barrier with a 20-dBA noise reduction, would still result in significant noise impacts at receptor locations R3 (residential use to the west) and R8 (motel use to the south). In order to eliminate this impact, construction activities would need to be moved approximately 600 feet easterly from receptor location R3 and 50 feet northernly from receptor location R8; in other words, new development could not occur on over half of the Project Site. Accordingly, this alternative was rejected as infeasible.

  Another alternative that was considered involved moving construction activities away from the adjacent residential building combined with the use of a tall sound wall. If the proposed development were moved approximately 100 feet easterly from the residential uses to the west (i.e., moved away from receptor location R3), then a 30-foot-tall sound wall extending approximately 1,000 feet along the western boundary of the construction areas would need to be erected in order to substantially reduce the noise impacts at the fourth story of the residential buildings along the west side of Radford Avenue. Additionally, the Los Angeles River segment of the western boundary would not have a sound barrier, given the existing condition of the river channel and infeasibility of erecting a sound barrier within that zone. Elimination of construction activities within 100 feet of this portion of the Project Site would not be reasonable or economically feasible. Furthermore, construction noise impacts associated with the off-site improvements would remain significant, as there is no adequate buffer distance between the adjacent residential uses and the off-site improvements (i.e., off-site construction along Radford Avenue and the alley), to reduce the construction noise. Therefore, this alternative was considered and rejected from further consideration.

  As provided in Table IV.K-12 in Section IV.K, Noise, of this Draft EIR, the Project's off-site construction trucks would exceed the significance threshold by up to 6.1 dBA along Radford Avenue. In order to reduce the noise impacts to a less-than-significant level, the construction truck trips would need to be limited to a maximum of 21 truck trips per hour. However, limiting the construction truck trips to 21 truck trips per hour would substantially increase the duration of haul truck activities by up to seven times and, thus, would not be feasible or reasonable. Therefore, this alternative was rejected for further consideration.

  With respect to on-site vibration, as discussed in Section IV.K, Noise, of this Draft EIR and shown in Table IV.K-32 therein, Project construction activities, involving a vibratory, large bulldozer, caisson drilling, jackhammer, or loaded trucks, would exceed the vibration threshold with respect to human annoyance at receptor locations R1, R3, and R8. As ground-borne vibration generated by human activities attenuates rapidly with distance from the vibration source, this impact could be reduced to a less-than-significant level by moving construction

activities using heavy equipment (i.e., vibratory roller) at least 140 feet away from receptor locations R1 and R3 and moving the large bulldozer, caisson drilling, or loaded trucks at least 80 feet away from receptor location R8. Although the Project's significant and unavoidable vibration impact would be reduced to a less-than-significant level, this alternative would render a substantial portion of the Project Site undevelopable, while a significant construction-related noise impact would continue to occur. As such, this alternative was rejected from further consideration.

With respect to off-site improvements, as provided in Table IV.K-33 in Section IV.K, Noise, of this Draft EIR, the Project's off-site construction would exceed the significance threshold at receptor locations R1, R3, R5, and R9. In order to reduce the vibration impacts to a less-than-significant level, heavy construction equipment (i.e., vibratory roller) would need to be moved at least 140 feet away from receptor locations R1, R3, R5, and R9. However, there is no adequate buffer distance between the adjacent residential uses and the off-site improvements to reduce the construction vibration impacts. As such, this alternative was rejected from further consideration.

With respect to the vibration impacts associated with off-site construction trucks, an alternative to eliminate the significant impact would be rerouting the construction trucks to roadways without sensitive uses (i.e., receptor location R8 along the alley), However, it would not be feasible to change the truck route, as the trucks would need to travel along the alley adjacent to receptor location R8, particularly when development within the southern portion of the Project Site occurs. As such, this alternative was rejected from further consideration.

- **Alternatives to Substantially Reduce or Eliminate Significant Air Quality Impacts During Construction:** Alternatives were also considered to substantially reduce or eliminate the significant short-term construction impacts of the Project. As discussed in Section IV.B, Air Quality, of this Draft EIR, regional air quality impacts would occur during portions of Project construction. However, given that construction would be distributed throughout the Project Site, impacts at any given location would be relatively short-term. Based on the thresholds upon which the construction analyses are based, a very substantial reduction in the intensity of construction activities would be necessary to reduce construction-related impacts to a less-than-significant level. In particular, to reduce air quality impacts to a less-than-significant level, maximum daily construction truck trips would need to be reduced by approximately 75 percent along with a similar reduction in on-site construction equipment. Furthermore, any reduction in the intensity of construction activities would increase the overall duration of the construction period. Therefore, alternatives to eliminate the proposed Project's short-term air quality impacts were rejected as infeasible.

4. Alternatives Analysis Format

In accordance with CEQA Guidelines Section 15126.6(d), each of the five selected alternatives described above is evaluated in sufficient detail to determine whether the overall environmental impacts would be less than, similar to, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the Project objectives, identified in Section II, Project Description, of this Draft EIR, would be substantially attained by the alternative pursuant to CEQA Guidelines Section 15126.6(c). The evaluation of each of the alternatives follows the process described below:

a. The net environmental impacts of the alternative are determined for each environmental issue area analyzed in Section IV, Environmental Impact Analysis, of this Draft EIR, assuming that the alternative would implement the same Project design features and mitigation measures identified in Section IV, Environmental Impact Analysis, of this Draft EIR.

b. Post-mitigation significant and non-significant environmental impacts of the alternative and the Project are compared for each environmental issue as follows:

   - Less: Where the net impact of the alternative would be clearly less adverse or more beneficial than the impact of the Project, the comparative impact is concluded to be less.

   - Greater: Where the net impact of the alternative would clearly be more adverse or less beneficial than the Project, the comparative impact is concluded to be greater.

   - Similar: Where the impact of the alternative and Project would be roughly equivalent, the comparative impact is concluded to be similar.

c. The comparative impact analysis is followed by a general discussion of whether the underlying purpose and basic Project objectives would be feasibly and substantially attained by the alternative.

A summary matrix that compares the impacts associated with the Project with the impacts of the alternatives analyzed below is provided in Table V-2 on page V-14.

Table V-2
Comparison of Impacts Associated with the Alternatives

Impact Area	Proposed Development Program	Alternative 1: No Project/No Build Alternative	Alternative 2: Development in Accordance with Existing Zoning Alternative	Alternative 3: Reduced Density Alternative	Alternative 4: Reduced Excavation/Grading Alternative	Alternative 5: Residential Mixed-Use Alternative
A. AESTHETICS						
Scenic Vistas	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Similar (Less Than Significant)
Conflict with Applicable Regulations Governing Scenic Quality	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Similar (Less Than Significant)
Light and Glare						
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Greater (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Greater (Less Than Significant)
B. AIR QUALITY[a]						
Conflicts with Plans	Less than Significant with Mitigation	Less (No Impact)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)
Regional Emissions						
Construction	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Less (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Operation	Less Than Significant	Less (No Impact)	Greater (Significant and Unavoidable)	Less (Less Than Significant)	Similar (Less Than Significant)	Greater (Significant and Unavoidable)
Concurrent Construction and Operation	Significant and Unavoidable	Less (No Impact)	Greater (Significant and Unavoidable)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)	Greater (Significant and Unavoidable)
Localized Emissions						
Construction	Less Than Significant w/ Mitigation	Less (No Impact)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)
Operation	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Greater (Less Than Significant)
Toxic Air Contaminants						
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Greater (Less Than Significant)
C. BIOLOGICAL RESOURCES						
Impacts to candidate, sensitive, or special status species identified in local or regional plans, policies, regulations or by the CDFW or USFWS	Less Than Significant w/ Mitigation	Less (No Impact)	Less (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)

Table V-2 (Continued)
Comparison of Impacts Associated with the Alternatives

Impact Area	Proposed Development Program	Alternative 1: No Project/No Build Alternative	Alternative 2: Development in Accordance with Existing Zoning Alternative	Alternative 3: Reduced Density Alternative	Alternative 4: Reduced Excavation/Grading Alternative	Alternative 5: Residential Mixed-Use Alternative
Impacts to State or Federally Protected Wetlands	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Impacts to Wildlife Corridors	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
Impacts to local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance	Less Than Significant w/ Mitigation	Less (No Impact)	Less (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)
C. CULTURAL RESOURCES						
Historical Resources	Less Than Significant w/ Mitigation	Less (No Impact)	Less (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)
Archaeological Resources	Less Than Significant w/ Mitigation	Less (No Impact)	Less (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)
Human Remains	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
D. ENERGY						
Wasteful, inefficient, or unnecessary consumption of Energy Resources						
Construction	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Greater (Less Than Significant)
Conflict with Plans for Renewable Energy or Energy Efficiency	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
E. GEOLOGY AND SOILS						
Geologic Hazards	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Paleontological Resources	Less Than Significant w/ Mitigation	Less (No Impact)	Less (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)
F. GREENHOUSE GAS EMISSIONS						
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Greater (Less Than Significant)
G. HAZARDS AND HAZARDOUS MATERIALS						
Construction	Less Than Significant w/ Mitigation	Less (No Impact)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)

Table V-2 (Continued)
Comparison of Impacts Associated with the Alternatives

Impact Area	Proposed Development Program	Alternative 1: No Project/No Build Alternative	Alternative 2: Development in Accordance with Existing Zoning Alternative	Alternative 3: Reduced Density Alternative	Alternative 4: Reduced Excavation/Grading Alternative	Alternative 5: Residential Mixed-Use Alternative
Operation	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Greater (Less Than Significant)
H. HYDROLOGY AND WATER QUALITY						
Surface Water Quality						
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Greater (Less Than Significant)
Groundwater Quality						
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Surface Water Hydrology						
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Groundwater Hydrology						
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Greater (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
I. LAND USE AND PLANNING						
Conflict with Land Use Plans	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Greater (Less Than Significant)
J. NOISE[b]						
Construction						
On-Site Noise	Significant and Unavoidable	Less (No Impact)	Less (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)
Off-Site Noise	Significant and Unavoidable	Less (No Impact)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)
On-Site Vibration (Building Damage)	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
On-Site Vibration (Human Annoyance)	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Off-Site Vibration (Building Damage)	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)

Table V-2 (Continued)
Comparison of Impacts Associated with the Alternatives

Impact Area	Proposed Development Program	Alternative 1: No Project/No Build Alternative	Alternative 2: Development in Accordance with Existing Zoning Alternative	Alternative 3: Reduced Density Alternative	Alternative 4: Reduced Excavation/Grading Alternative	Alternative 5: Residential Mixed-Use Alternative
Off-Site Vibration (Human Annoyance)	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Operation						
On-Site Noise	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Off-Site Noise	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Greater (Less Than Significant)
Vibration	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
K. PUBLIC SERVICES						
Fire Protection						
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Greater (Less Than Significant)
Police Protection						
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Greater (Less Than Significant)
L. TRANSPORTATION						
Conflict with Plans	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Vehicle Miles Traveled	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Greater (Less Than Significant)	Similar (Less Than Significant)	Greater (Less Than Significant)
Freeway Safety Analysis	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Greater (Less Than Significant)
M. TRIBAL CULTURAL RESOURCES						
Tribal Cultural Resources	Less Than Significant w/ Mitigation	Less (No Impact)	Less (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)
N. UTILITIES AND SERVICE SYSTEMS						
Water Supply and Infrastructure						
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Greater (Less Than Significant)

Table V-2 (Continued)
Comparison of Impacts Associated with the Alternatives

Impact Area	Proposed Development Program	Alternative 1: No Project/No Build Alternative	Alternative 2: Development in Accordance with Existing Zoning Alternative	Alternative 3: Reduced Density Alternative	Alternative 4: Reduced Excavation/Grading Alternative	Alternative 5: Residential Mixed-Use Alternative
Wastewater						
Construction	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Greater (Less Than Significant)
Solid Waste						
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Greater (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
Electric Power, Natural Gas, and Telecommunications Infrastructure						
Construction	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Greater (Less Than Significant)

[a] *Cumulative regional emissions would be significant and unavoidable during construction and during overlap of construction with operation of the Project.*
[b] *Cumulative impacts associated with on- and off-site noise during construction and on- and off-site vibration (pursuant to the significance threshold for human annoyance) during construction would also be significant and unavoidable.*
Source: Eyestone Environmental, 2025.

V. Alternatives

A. Alternative 1: No Project/No Build Alternative

1. Description of the 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. CEQA Guidelines Section 15126.6(e)(3)(B) states in part that "in certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, Alternative 1, the No Project/No Build Alternative, assumes that the Project would not be approved, no new permanent development would occur within the Project Site, and the existing environment, as described in Section II, Project Description, of this Draft EIR, would be maintained. Thus, the physical conditions of the Project Site would generally remain as they are today. Specifically, the existing buildings and above-ground parking structures and surface parking areas would remain on the Project Site, and no new construction beyond ongoing production activities would occur. The site plan for Alternative 1, which reflects existing conditions at the Project Site, is provided in Figure II-3, Existing Site Plan, in Section II, Project Description, of this Draft EIR.

2. Environmental Impacts

a. Aesthetics

The Project is an employment center project located in a Transit Priority Area (TPA) pursuant to PRC Section 21099 as modified by Assembly Bill (AB) 2553. As such, its aesthetic impacts are less than significant as a matter of law. The analysis of aesthetics impacts in Section IV.A of this Draft EIR and in the analysis of the alternatives is therefore provided for informational purposes only.

(1) Scenic Vistas

As described in Section IV.A, Aesthetics, of this Draft EIR, the Project Site is visible from several locations to the south of the Project Site within the Santa Monica Mountains, and the degree of visibility is dependent on the distance of the viewpoint from the Project Site, as well as intervening topography. Under Alternative 1, no construction activities would occur, and the existing buildings and uses would remain. Therefore, Alternative 1 would not

have the potential to reduce or block existing views of scenic vistas in the vicinity of the Project Site. No impacts would occur, and such impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Conflict with Zoning and Regulations regarding Scenic Quality

Under Alternative 1, no construction activities would occur and the existing buildings and uses would remain. Therefore, Alternative 1 would have no potential to conflict with applicable zoning and other regulations governing scenic quality. No impacts would occur, and such impacts would be less compared to the less-than-significant impacts of the Project.

(3) Light and Glare

(a) Construction

Alternative 1 would not involve the construction of any new development on-site. Therefore, Alternative 1 would not introduce new light sources associated with construction equipment or construction-related equipment and materials with the potential to cause glare. As such, no impacts related to light and glare associated with construction activities would occur under Alternative 1. Thus, light and glare impacts during construction would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 would not alter the existing uses on the Project Site, introduce any new sources of light or glare on the Project Site, or otherwise increase the amount of activity occurring on-site. Therefore, Alternative 1 would not change the existing lighting environment on the Project Site. No operation-related light and glare impacts would occur under Alternative 1. Thus, impacts related to operational light and glare under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

b. Air Quality

(1) Conflicts with Plans

Alternative 1 would not alter the existing development or involve any new construction activities on the Project Site. Therefore, no construction-related air quality emissions would occur and Alternative 1 would not conflict with or obstruct implementation of the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP). Impacts would be less than the less-than-significant impacts of the Project.

(2) Construction Emissions

(a) Regional and Localized Air Quality Impacts

Alternative 1 would not alter the existing development or involve any new construction activities on the Project Site. Therefore, no construction-related air quality impacts associated with regional and localized emissions would occur. Impacts under Alternative 1 would be less when compared to the Project's construction-related significant and unavoidable impacts associated with regional emissions and the less-than-significant impacts after mitigation that are associated with localized emissions. In particular, the Project's significant and unavoidable impact related to regional NOx emissions and localized PM_{10} and $PM_{2.5}$ would be avoided.

(b) Toxic Air Contaminants

Since construction activities would not occur on the Project Site, Alternative 1 would not result in diesel particulate matter (DPM) emissions during construction that could generate substantial toxic air contaminants (TACs). Therefore, no construction-related impacts associated with the release of TACs would occur. As such, under Alternative 1, the TAC impacts would be less when compared to the Project's less-than-significant impact.

(3) Operational Emissions

(a) Regional and Localized Air Quality Impacts

Alternative 1 would not result in new development or increased operations that could generate additional operational emissions related to vehicular traffic or the consumption of electricity beyond what is currently generated by the existing uses and activities on the Project Site. Therefore, no operational air quality impacts associated with regional and localized emissions would occur. Impacts would be less when compared to less-than-significant impacts of the Project.

(b) Toxic Air Contaminants

As discussed in Section IV.B, Air Quality, of this Draft EIR, studio operations do not generate substantial sources of TACs. Thus, continued operation of the studio would not result in significant impacts associated with TACs, and no additional sources of TACs would be generated. As such, no operational impacts associated with TACs would occur under Alternative 1, and such impacts would be less when compared to the Project's less-than-significant impact.

(4) Concurrent Construction and Operation

With no new construction activities, Alternative 1 would not generate concurrent construction and operational emissions. Impacts would be less when compared to the Project's significant and unavoidable impact associated with the emissions of NO_X during concurrent construction and operation of the Project under a potential long-term buildout scenario and which would be avoided under Alternative 1.

c. Biological Resources

Alternative 1 would not result in the construction of new facilities that would result in the removal of trees or affect biological resources. Therefore, no impact to biological resources would occur under Alternative 1, which would eliminate the less-than-significant impacts of the Project after mitigation as related to two special status wildlife species (i.e., the big free-tailed bat and western mastiff bat) and protected trees. Accordingly, impacts to biological resources under Alternative 1 would be less when compared to less-than-significant impacts of the Project after mitigation.

d. Cultural Resources

(1) Historical Resources

As discussed in Section IV.D, Cultural Resources, of this Draft EIR, the Project Site includes three potentially historic structures (i.e., the Mill Building, the Administration Building, and Stage 2), as well as the potential Mack Sennett Historic District. Alternative 1 would not involve any construction activities that could affect on-site historical resources, and no new buildings or changes to the physical environment that could affect the historical context of the on-site historical resources would be introduced. Therefore, Alternative 1 would result in no impact to historical resources and, as such, would be less when compared to the Project's less-than-significant impacts after mitigation, which would be avoided under this alternative.

(2) Archaeological Resources

As discussed in Section IV.D, Cultural Resources, of this Draft EIR, the South Central Coastal Information Center (SCCIC) records search did not identify any known archaeological resources within the Project Site. However, the geoarchaeological investigation conducted as part of the Archaeological Resources Assessment, included as Appendix F.2 of this Draft EIR, indicates that, while no artifacts were found, the Project Site may contain historical-period and prehistoric archaeological deposits. As such, there is high sensitivity for buried archaeological resources within the Project Site. As no construction or earthwork would occur under Alternative 1, no impact with respect to archaeological

resources would occur. Therefore, impacts under Alternative 1 would be less when compared to the Projects less-than-significant after mitigation, which would be avoided under this alternative.

(3) Human Remains

With regard to human remains, no known traditional burial sites have been identified on the Project Site. Section IV.D, Cultural Resources, of this Draft EIR, concludes that through compliance with applicable regulatory requirements, potential impacts to human remains would be less than significant. As no construction or earthwork would occur under Alternative 1, no impact with respect to human remains would occur and would be less when compared to the Project's less-than-significant impacts.

e. Energy

(1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

Construction activities would not occur under Alternative 1 and, thus, would not generate a short-term demand for energy, and no impact would occur. Therefore, this impact would be less when compared to the Project's less-than-significant impact.

With regard to operations, Alternative 1 would not alter the existing land uses or operations on the Project Site or result in new development that would increase the demand for energy. Therefore, Alternative 1 would not increase the long-term energy demands on the Project Site, and no impact would occur. This impact would be less when compared to the Project's less-than-significant impact.

(2) Conflict with Plans for Renewable Energy or Energy Efficiency

Alternative 1 would not alter the existing land uses or site operations on the Project Site. However, unlike the Project, Alternative 1 would not include new buildings meeting updated energy efficiency requirements, such as those set forth in the 2022 California Green Building Standards (CALGreen) Code and the Los Angeles Green Building Code. Some of the existing inefficiencies related to energy would likely persist, including outdated technology and building systems, such as heating, ventilation, and air conditioning (HVAC) equipment. Nevertheless, no new energy impacts would occur, and impacts would be less when compared to the Project's less-than-significant impact.

f. Geology and Soils

(1) Geologic Hazards

No construction or earthwork would occur under Alternative 1. Therefore, no impacts with respect to geologic hazards would occur, and impacts would be less when compared to the Project's less-than-significant impacts.

(2) Paleontological Resources

As discussed in Section IV.F, Geology and Soils, of this Draft EIR, a records search at the Natural History Museum (NHMLA) found no previously recorded vertebrate fossil localities directly underlying the Project Site. However, the records search results indicate that there are seven nearby paleontological localities from similar geologic units to those underlying and surrounding the Project Site. Nonetheless, as no construction or earthwork would occur under Alternative 1, no impact with respect to paleontological resources would occur. Thus, impacts would be less when compared to the Project's less-than-significant impact after mitigation, which would be avoided under this alternative.

g. Greenhouse Gas Emissions

Alternative 1 would not involve the construction of new buildings or the operation of additional uses on the Project Site. Therefore, no new greenhouse gas (GHG) emissions would be generated, and no impacts associated with global climate change would occur. As such, impacts associated with GHG emissions would be less when compared to the Project's less-than-significant impact.

h. Hazards and Hazardous Materials

(1) Construction

Construction activities, including earthwork, grading, and demolition, would not occur under Alternative 1. Therefore, Alternative 1 would not involve any new use, handling, storage, or disposal of construction-related hazardous materials or have the potential to expose or release potentially contaminated soil or subsurface gases. Impacts would be less when compared to the Project's less-than-significant after mitigation, which would be avoided under this alternative.

(2) Operation

Alternative 1 would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not involve any new or increased use, handling, storage,

or disposal of hazardous materials, hazardous emissions, or upset or accident conditions. No impacts would occur, and impacts would be less when compared to the Project's less-than-significant impacts.

i. Hydrology and Water Quality

(1) Surface Water Quality

(a) Construction

As no new development would occur, Alternative 1 would not have the potential to contribute to pollutant loading in stormwater runoff associated with construction activities. Therefore, no construction-related impacts to surface water quality would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Under Alternative 1, no new permanent development would occur, and existing development and activities would remain unchanged. Therefore, Alternative 1 would not introduce any new pollutants or increase pollutant loadings in surface water runoff generated within the Project Site. As such, impacts to surface water quality during operations under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

(2) Groundwater Quality

(a) Construction

No grading or excavation would occur under Alternative 1. Therefore, there would be no potential to increase groundwater contamination or cause regulatory water quality standards at an existing production well to be violated. Thus, no construction-related impacts to groundwater quality would occur under this alternative, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Under Alternative 1, no new permanent development would occur that could result in new or increased use of potentially hazardous materials. Therefore, there would be no potential for Alternative 1 to release contaminants into the groundwater that could affect existing groundwater quality, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing

production well. Thus, no operational impacts to groundwater quality would occur, and impacts would be less when compared to the less-than-significant impacts of the Project.

(3) Surface Water Hydrology

(a) Construction

As no new development would occur, Alternative 1 would not have the potential to temporarily alter existing surface drainage patterns or flows. Therefore, no impacts to surface water hydrology during construction would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Under Alternative 1, no new permanent development would occur, and existing development would remain on-site. Therefore, Alternative 1 would not alter the amount of pervious surfaces on the Project Site, and no modifications to the existing drainage patterns or increase in the volume of runoff generated from the Project Site would occur. As such, no impacts to surface water hydrology during operation would occur under Alternative 1, and such impacts would be less when compared to the less-than-significant impacts of the Project.

(4) Groundwater Hydrology

(a) Construction

No grading or excavation would occur under Alternative 1. Therefore, there would be no potential to encounter groundwater beneath the Project Site, and no dewatering associated with construction would be necessary. Thus, no construction-related impacts to groundwater hydrology would occur, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Under Alternative 1, no new permanent development would occur, and no increase in impervious surfaces on the Project Site would occur that could affect groundwater recharge rates on-site. However, Alternative 1 would not increase pervious surfaces or implement Low Impact Development (LID) Best Management Practices (BMPs) such as capture and use or biofiltration systems that would improve the groundwater recharge capacity of the Project Site. Thus, while impacts to groundwater hydrology during operation of Alternative 1 would be less than significant, such impacts would be greater when compared to the less-than-significant impacts of the Project.

j. Land Use and Planning

Under Alternative 1, there would be no changes to the physical or operational characteristics of the Project Site. Thus, no impacts associated with conflicts with land use plans or regulations would occur, and impacts would be less when compared to the less-than-significant impacts of the Project.

k. Noise

(1) Noise

(a) Construction

No new construction activities would occur under Alternative 1. As such, no construction-related on- or off-site noise impacts would occur under this alternative. As such, impacts would be reduced in comparison to the Project. Specifically, Alternative 1 would avoid the Project's significant unavoidable noise impacts associated with on-site construction equipment, off-site improvements, and off-site haul trips.

(b) Operation

Alternative 1 would not develop new uses on the Project Site, and no changes to existing site operations would occur. Thus, no new or increased stationary or mobile (e.g., traffic) noise sources would be introduced to the Project Site or in the surrounding vicinity. As such, no impacts associated with operational on- or off-site noise would occur under Alternative 1. Therefore, the operational noise impacts of Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

No construction-related vibration would be generated on or off-site under Alternative 1, and no construction-related vibration impacts would occur. As such, on- and off-site construction-related vibration impacts related to both building damage would be less than the impacts of the Project, which would be less than significant. In addition, Alternative 1 would avoid the Project's significant and unavoidable on- and off-site vibration impacts associated with human annoyance resulting from on- and off-site construction equipment and off-site haul trips.

(b) Operation

Alternative 1 would not involve the development of new uses or facilities on the Project Site, and no changes to existing site operations would occur. Thus, no new on- or off-site vibration sources would be introduced within the Project Site or in the surrounding vicinity. As such, no impacts associated with operational on- and off-site vibration would occur under Alternative 1, and such impacts would be less when compared to the less-than-significant impacts of the Project.

I. Public Services

(1) Fire Protection

(a) Construction

As Alternative 1 would not include any construction activities, it would not result in a construction-related demand for Los Angeles Fire Department (LAFD) fire protection facilities or services. Thus, no construction-related fire protection impacts would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

No changes to the existing land uses or operations on the Project Site would occur under Alternative 1. Therefore, Alternative 1 would not increase fire safety hazards, generate new fire protection needs, require additional fire flows, or result in any changes to emergency access or response times. Thus, no impacts to fire protection facilities would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Police Protection

(a) Construction

As Alternative 1 would not include any construction, it would not result in a construction-related demand for police protection facilities or services from the Los Angeles Police Department (LAPD). Therefore, Alternative 1 would not result in any police protection impacts due to construction, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

No changes to existing on-site land uses or operations would occur under Alternative 1. Therefore, Alternative 1 would not increase the level of activity on-site, increase the

service population of the LAPD stations serving the Project Site, generate new police protection needs, or result in any changes to emergency access or response times. Thus, no impacts to police protection facilities would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

m. Transportation

Since Alternative 1 would not involve the development of new or additional land uses on the Project Site, Alternative 1 would not generate any new vehicle trips and associated VMT or alter existing access/circulation within and surrounding the Project Site. Therefore, no impacts would occur with respect to conflicts with programs, plans, ordinances, and policies addressing the circulation system; VMT; and freeway safety. As such, impacts under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

n. Tribal Cultural Resources

As discussed in Section IV.N, Tribal Cultural Resources, of this Draft EIR, there is high sensitivity for a tribal cultural resource within the Project Site. However, grading and other earthwork activities would not occur under Alternative 1. Therefore, there would be no potential for Alternative 1 to uncover subsurface tribal cultural resources. As such, no impacts to tribal cultural resources would occur under Alternative 1, and impacts would be less than those under the Project, which would be less than significant with mitigation.

o. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Construction activities would not occur under Alternative 1. Therefore, Alternative 1 would not generate a short-term demand for water during construction, and construction-related impacts to water supply and infrastructure would not occur. As such, impacts under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 would not alter the existing land uses or operations on the Project Site. Therefore, Alternative 1 would not increase the long-term water demand associated with the Project Site. No operational impacts to water supply and water infrastructure would occur

under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Construction activities would not occur under Alternative 1. Therefore, Alternative 1 would not generate wastewater during construction, and construction-related impacts to wastewater conveyance and treatment facilities would not occur. As such, impacts related to wastewater under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 would not alter the existing land uses or operations on the Project Site. Therefore, Alternative 1 would not increase operational wastewater flows from the Project Site. Since no operational impacts related to wastewater conveyance and treatment facilities would occur, impacts related to wastewater under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

(3) Solid Waste

(a) Construction

Construction activities would not occur under Alternative 1. Therefore, Alternative 1 would not generate solid waste during construction, and construction-related impacts to solid waste facilities would not occur. As such, impacts under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the operational solid waste production on the Project Site. No operational impacts to solid waste collection or disposal facilities would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(4) Electric Power, Natural Gas, and Telecommunications Infrastructure

(a) Construction

Construction activities would not occur under Alternative 1. Therefore, Alternative 1 would not result in an increase in energy demand that exceeds available distribution infrastructure capabilities that would require the construction of new or expanded energy facilities, the construction of which could cause significant environmental effects. As such, impacts related to electricity, natural gas, and telecommunications infrastructure under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 would not alter the existing land uses or operations on the Project Site. Therefore, Alternative 1 would not result in an increase in energy or telecommunications demand that exceeds available distribution infrastructure capabilities that would require the construction of new or expanded facilities, the construction of which could cause significant environmental effects. Since no operational impacts related to electricity, natural gas, and telecommunications infrastructure would occur under Alternative 1, impacts would be less when compared to the less-than-significant impacts of the Project.

3. Comparison of Impacts

Alternative 1 would avoid the Project's significant and unavoidable impacts with respect to Project-level and cumulative regional construction-related emissions of NO_X, on- and off-site noise during construction, and on-site vibration during construction (based on the significance threshold for human annoyance). Alternative 1 would also avoid the Project's significant and unavoidable Project-level impact with respect to off-site vibration during construction. In addition, Alternative 1 would avoid the Project's impacts that were determined to be less than significant with mitigation, including those related to localized air quality emissions during construction, biological resources, cultural resources, paleontological resources, hazards and hazardous materials, and tribal cultural resources. Impacts associated with the remaining environmental issues also would generally be less when compared to Project's less-than-significant impacts.

4. Relationship of the Alternative to Project Objectives

Under Alternative 1, the existing buildings and associated surface parking would remain on the Project Site, and no new development would occur. As such, Alternative 1

would not fully meet the underlying purpose of the Project, which is to maintain Radford Studio Center as a studio and to modernize and enhance production facilities within the Project Site to accommodate both the existing unmet and anticipated future demands of the entertainment industry, keep production activities and jobs in Los Angeles, upgrade utility and technology infrastructure, and create a cohesive studio lot because the existing facility would not be modernized and enhanced. Furthermore, Alternative 1 would not meet any of the Project objectives, as listed below:

- Ensure the Project Site retains existing studio uses and provide an expandable and flexible production platform, including sound stages, production support, and office space regulated through the establishment of a Specific Plan to respond to evolving market demands and studio production needs while ensuring compatibility with applicable local and regional plans, specifically the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan.

- Establish clear guidelines to preserve historic elements of the studio while modernizing and expanding the studio to ensure its continued operational success in the future.

- Create an integrated studio campus that is capable of addressing the evolving demands of the media and entertainment industry, incorporates a mix of compatible land uses, and ensures the Project is compatible with the immediate neighborhood by concentrating building heights away from Project Site edges.

- Optimize the currently underutilized Project Site to accommodate the existing unmet and anticipated future demands of the entertainment industry by providing new, state-of-the-art sound stages, production support facilities, production offices, and general offices, and upgraded on-site elements, such as circulation, staging, basecamp, outdoor production and parking areas, while remedying past haphazard building additions and prioritizing efficient production operations.

- Grow the local and regional economy by providing a wide range of entertainment and media-related jobs and keeping production jobs in Los Angeles.

- Enhance access through the provision of multiple safe, secure, and efficient entry points to the Project Site. Additionally, ensure the Project is consistent with the intent of the Los Angeles River Revitalization Master Plan, provides an enhanced public right-of-way to promote walkability, strengthens bicycle access, and fosters safety and connectivity in the local community.

- Provide multi-modal transportation solutions, including Project Mobility Hubs with services that are integrated with public transit lines and encourage alternative means of transportation and mobility.

- Enhance the identity of the Project Site as an iconic entertainment and media center by providing an architecturally distinct design and a creative signage

program that reflects and complements the production, media, and entertainment uses on-site.

- Create a model of sustainability in modern production studio development and operations by committing to an all-electric development and integrating best management practices with regard to water, energy, and resource conservation.

V. Alternatives

B. Alternative 2: Development in Accordance with Existing Zoning Alternative

1. Description of the Alternative

Alternative 2, the Development in Accordance with Existing Zoning Alternative, would involve development of the Project Site in accordance with the existing zoning and land use regulations for the Project Site. As described in Section II, Project Description, of this Draft EIR, the Project Site is designated by the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan of the City's General Plan as Light Industrial for the North Lot, Light Manufacturing for the South Lot, and Open Space for the Tujunga Wash and Los Angeles River areas. The North Lot is zoned [Q]MR2-1L-RIO (subject to a "Q" Qualified Classification or Q Condition, Restricted Light Industrial Zone, Height District 1L, River Improvement Overlay) and the South Lot is zoned [Q]M2-1-RIO (subject to a "Q" Qualified Classification, Light Industrial Zone, Height District 1, River Improvement Overlay). The portions of the Project Site containing the Los Angeles River and Tujunga Wash are zoned OS-1XL-RIO (Open Space Zone, Height District 1XL, River Improvement Overlay).

The MR2 Zone on the North Lot permits aircraft factory, brewery, embalming, funeral parlor, pigeon keeping, scrap metal collection and yeast manufacturing, along with numerous conditionally allowed uses, such as motion picture studio, television studio, tavern, and recording studio. All uses located in the MR2 Zone and within Height District No. 1L situated greater than 199 feet away from the OS Zone are restricted to a maximum height of 75 feet and not to exceed six stories. All uses located in the MR2 Zone and within Height District 1L situated within 50 feet of the OS Zone are restricted to a maximum height of 25 feet, those uses situated within 100-feet of the OS Zone are restricted to a maximum height of 33 feet, and those uses situated within 199 feet of the OS Zone are restricted to a maximum height of 61 feet. The MR2 Zone imposes a 15-foot front yard setback requirement.[2] The M2 Zone on the South Lot permits adhesive manufacturing, aircraft engine testing, automobile wrecking, fertilizer manufacturing and sales, kennel, mental institution, and television station, along with numerous conditionally allowed uses, such as church, cocktail lounge, microbrewery, swap meet, and motion picture studio. All uses located in the M2 Zone and

[2] *LAMC Section 12.21.B.1 allows motion picture studio stages, scenes or skybackings, temporary towers and the like to be erected to a height of 125 feet if the building and structures observe front, side, and rear yards prescribed in said section.*

within Height District No. 1 situated greater than 199 feet away from the OS Zone have unlimited height. All uses located in the MR2 Zone and within Height District 1L situated within 50 feet of the OS Zone are restricted to a maximum height of 25 feet, and those uses situated within 100 feet of the OS Zone are restricted to a maximum height of 33 feet, and those uses situated within 199 feet of the OS Zone are restricted to a maximum height of 61 feet. The M2 Zone does not impose any setback requirements on commercial or industrial uses. The OS Zone permits parking, park or playground, and recreation area, along with numerous conditionally allowed uses, such as a community center, cemetery, or nature preserve. All uses located in the OS Zone and within Height District No. 1XL are restricted to a maximum height of 30 feet and not to exceed two stories. The OS Zone does not impose any setback requirements.

The Q conditions on the site vary by zoning designation and lot. Within the North Lot, the Q condition attached to the MR2-1L Zone (included within Ordinance Nos. 172,446 and 168,218) restricts the entirety of the North Lot to television/movie studio facility uses (including operating conditions related to audience delivery buses parking on Radford Avenue). Additionally, the City adopted Ordinance No. 176,590 (CPC-2003-8809-ZC-CU), amending Section 12.04 of the LAMC to amend the zoning of the North Lot. As part of that entitlement, Q conditions were imposed upon the North Lot, limiting its development to a maximum floor area of 279,250 square feet, including 75,428-square feet of office, 11,325 square feet of sound stage, and 75,132 square feet of technical production and support facilities. These conditions also include a minimum number of parking spaces, buffers, setbacks, fencing, door size limits, and access limitations. Within the South Lot, the Q condition attached to the M2-1 Zone (included within Ordinance Nos. 164,341) limits its use to motion picture and/or television production and related uses.

Based on the existing land use and zoning of the Project Site as described above, Alternative 2 would increase the amount of new floor area compared to the Project. Specifically, Alternative 2 would include the construction of an estimated 1,820,875 square feet of new development (compared to 1,667,010 square feet under the Project), the demolition of approximately 599,985 square feet of existing studio-related uses (compared to up to 646,120 square feet under the Project), and the retention of an estimated 579,125 of existing studio-related uses (compared to 532,990 square feet under the Project), resulting in a net increase of 1,220,890 square feet of floor area (compared to 1,020,890 square feet under the Project). The uses proposed by Alternative 2 would be the same uses as the Project (sound stage, production support, production office, general office, and retail). Overall, upon completion of Alternative 2, the Project Site would include a total of 2,400,000 square feet of development with an FAR of approximately 1.24:1. This development would include 450,000 square feet of sound stage uses, 360,000 square feet of production support uses, 840,000 square feet of production office uses, 720,000 square feet of general office uses, and 30,000 square feet of retail uses. In comparison, the total Project Site floor area upon completion of the Project would be 2,200,000 square feet with an FAR of

approximately 0.96:1. Refer to Table V-1 on page V-7 for a detailed summary of the proposed uses and floor area proposed under Alternative 2 compared to the Project. Unlike the Project, Alternative 2 would not include the Radford Bridge but would include the Class IV bikeway and utility improvements.

As shown in Figure V-1 on page V-37, new development proposed by Alternative 2 would be concentrated within the South Lot, and no new development would occur within the North Lot, which would differ from the Project where proposed development would occur within both the North Lot and the South Lot. As with the Project, the proposed uses would be provided in several structures across the South Lot. As described above, all uses located in the M2 Zone of the South Lot, within Height District No. 1, and greater than 199 feet in distance from the OS Zone have unlimited height. Therefore, whereas the Project would include a maximum permitted and proposed height of 135 feet, the buildings under Alternative 2 would include maximum heights up to 190 feet, which is permitted under the current zoning.

As with the Project, approximately 6,050 parking spaces would be provided within a combination of above-ground and subterranean parking structures and existing surface parking spaces. Excavation for the proposed subterranean parking under Alternative 2 would extend to a maximum estimated depth of 50 feet, similar to the Project. However, since Alternative 2 would not include grading or excavation for subterranean parking within the North Lot, Alternative 2 would result in a reduction in the amount of export and fill compared to the Project. Specifically, Alternative 2 would result in approximately 896,000 cubic yards of cut and approximately 49,000 cubic yards of fill, resulting in approximately 847,000 cubic yards of net export. In comparison, earthwork activities necessary for construction of the Project would require an estimated 935,000 cubic yards of cut with approximately 55,000 cubic yards of fill used on-site, resulting in approximately 880,000 cubic yards of net export. As with the Project, this analysis assumes that buildout of Alternative 2 may occur in one phase over a 39-month timeline, with completion in 2028, or that a long-term buildout option could be exercised with completion in 2045.[3]

[3] *Only those impacts that could vary with a long-term buildout are specifically addressed in the analysis below.*

LEGEND

- PROJECT PROPERTY LINE
- SOUND STAGES
- PRODUCTION SUPPORT
- PRODUCTION OFFICE
- CREATIVE OFFICE
- RETAIL
- PARKING
- EXISTING BUILDING

LAND USE SUMMARY

- 2,400,000 Total square feet
- 1,820,875 sf of new studio-related uses
- 579,125 sf of existing studio-related uses
- Total of approximately 6,050 parking spaces
- Total 1.24:1 FAR
- Maximum permitted height: Unlimited

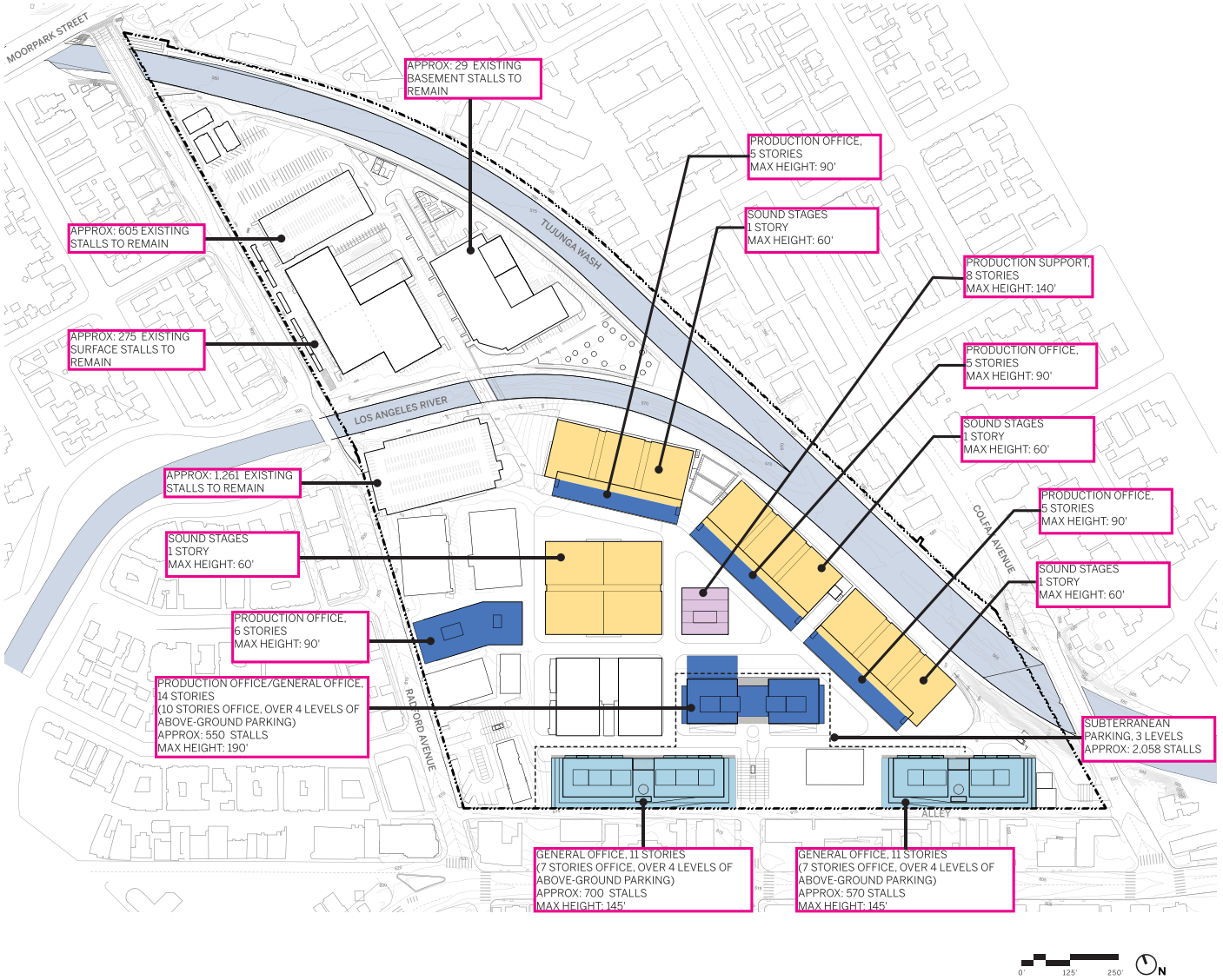

Figure V-1
Alternative 2 Site Plan

Source: Skidmore, Owings & Merrill, 2024.

2. Environmental Impacts

a. Aesthetics

The Project is an employment center project located in a TPA pursuant to PRC Section 21099 as modified by AB 2553. As such, its aesthetic impacts are less than significant as a matter of law. The analysis of aesthetics impacts in Section IV.A of this Draft EIR and in the analysis of the alternatives is therefore provided for informational purposes only.

(1) Scenic Vistas

As described in Section IV.A, Aesthetics, of this Draft EIR, the Project Site is visible from several locations to the south of the Project Site within the Santa Monica Mountains, and the degree of visibility is dependent on the distance of the viewpoint from the Project Site, as well as intervening topography. As evaluated in Section IV.A, Aesthetics, of this Draft EIR, while the Project would result in some changes in the visual appearance of the Project Site and would be visible to varying degrees from the scenic viewpoints in the vicinity of the Project Site, the Project would not substantially reduce or block existing views available from these viewpoints or reduce the field of view of the scenic vistas available from these viewpoints. Rather, the Project would place buildings and other improvements on a site that is already developed with numerous studio buildings and located in a developed urbanized area.

As described above, Alternative 2 would include similar studio uses as the Project. While Alternative 2 would increase the maximum height of buildings compared to the Project from 135 feet for the Project to 190 feet under Alternative 2, this proposed development would be concentrated within the South Lot, and the North Lot would remain as per existing conditions. Therefore, as with the Project, while Alternative 2 would result in some changes in the visual appearance of the Project Site and would be visible to varying degrees from the scenic viewpoints in the vicinity of the Project Site, Alternative 2 would not substantially reduce or block existing views of scenic resources available from these viewpoints or reduce the field of view of the scenic vistas available from these viewpoints. Accordingly, as with the Project, Alternative 2 would not block scenic vistas, and such impacts would be less than significant. However, with the increased heights of Alternative 2, such impacts would be greater when compared to those of the Project.

(2) Conflict with Applicable Regulations Governing Scenic Quality

As discussed in Section IV.A, Aesthetics, of this Draft EIR, a number of existing City plans and regulations governing scenic quality are applicable to the Project Site, including the City's General Plan (i.e., the Framework Element, Conservation Element,

and the Community Plan), the RIO, the LAMC, and the Citywide Design Guidelines. As demonstrated in the analysis in Section IV.A, Aesthetics, of this Draft EIR, overall, the Project would not conflict with these regulations. Since Alternative 2 would be developed within the same Project Site as the Project, these same plans and applicable goals, objectives, and policies would be applicable to Alternative 2.

While Alternative 2 would increase the amount of floor area and height of buildings compared to the Project, Alternative 2 would specifically be developed in accordance with existing land use and zoning regulations. Therefore, overall, with the development of similar uses as the Project and a similar design to that of the Project, Alternative 2 would generally not be in conflict with existing zoning and other regulations governing scenic quality. Therefore, similar to the Project, the impacts of Alternative 2 related to potential conflicts with the zoning and other regulations governing scenic quality would be less than significant.

(3) Light and Glare

(a) Construction

As with the Project, while the majority of construction under Alternative 2 would occur during daylight hours, construction activities could potentially occur in the evening hours and require the use of artificial lighting. As with the Project, to the extent Alternative 2 requires evening construction and includes artificial light sources, such use would be temporary and would cease upon completion of construction in a given area of the Project Site. As with the Project, any glare generated within the Project Site during construction of Alternative 2 would be highly transitory and short-term given the movement of construction equipment and materials within the construction area. In addition, as with the Project, Alternative 2 would include Project Design Features AES-PDF-1 and AES-PDF-2 that would require the erection of temporary 10-foot-tall, opaque construction fencing around construction sites that are visible from the adjacent public streets, Los Angeles River, and Tujunga Wash, as well as require that outdoor construction lighting be directed away from adjacent residential properties and the public right-of-way. Therefore, similar to the Project, light resulting from construction activities under Alternative 2 would not create a new source of substantial light which would adversely affect daytime or nighttime views in the area. Furthermore, given that development of Alternative 2 would occur within the South Lot only, any light or glare resulting from the Project construction within the North Lot would be eliminated under Alternative 2.

Based on the above, as with the Project, construction of Alternative 2 would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area, and impacts related to light and glare during construction of Alternative 2 would be less than significant. However, such impacts under Alternative 2 would be less when compared to the less-than-significant impacts of the Project since the area where construction activities would occur would be reduced compared to the Project (construction

activities and any associated generation of light or glare would not occur within the North Lot under Alternative 2).

(b) Operation

As with the Project, Alternative 2 would potentially increase light levels within the Project Site and the surrounding area compared to existing conditions through the introduction of new sources of stationary, signage, and landscape lighting. However, these new lighting sources and increased light levels would be concentrated within the South Lot as the North Lot would not be developed under Alternative 2. In addition, as with the Project, the proposed lighting sources under Alternative 2 would be similar to other lighting sources in the Project Site vicinity and would not generate artificial light levels that are out of character with the surrounding area.

As with the Project, future stationary lighting for Alternative 2 would be regulated by similar lighting requirements of the proposed Specific Plan, which are incorporated as Project Design Features AES-PDF-3 through AES-PDF-19 in Section IV.A, Aesthetics, of this Draft EIR. These project design features would limit the light from stationary lighting at adjacent sensitive use properties by defining performance requirements that limit light trespass onto an adjacent property with a sensitive use. These project design features also define requirements that would ensure all exterior stationary lighting sources would not be visible from adjacent sensitive use properties and would not present a new source of glare. With implementation of the project design features, illumination from stationary exterior lighting and signage would be less than 2 and 3 footcandles (fc), respectively, and, thus, would be less than significant under Alternative 2. The project design features would also ensure that signage does not result in high contrast or glare. In addition, with a reduction in basecamp and outdoor production areas compared with existing conditions, light and glare impacts associated with these continued uses would also be less than significant under Alternative 2. Overall, Alternative 2 would concentrate new development on the South Lot but result in increased building heights to accommodate the increase in program floor area. Thus, potential light and glare impacts under Alternative 2 would be similar to the less-than-significant impacts of the Project.

b. Air Quality

(1) Conflicts with Plans

As discussed further below, like the Project, Alternative 2 would result in potentially significant localized air quality emissions which would conflict with the AQMP. However, as with the Project, these impacts would be mitigated to a less than significant level with the incorporation of Mitigation Measures AIR-MM-1 and AIR-MM-2. These emissions would be further reduced with the inclusion of Mitigation Measures AIR-MM-3 and AIR-MM-4. With

respect to operation, as with the Project, Alternative 2 represents infill development located in close proximity to existing transit lines and would utilize existing infrastructure to serve the proposed uses. As such, like the Project, Alternative 2 would advance regional goals to reduce VMT through infill development near transit that would reduce air pollutant emissions compared to an average regional project. Alternative 2 would similarly result in less than significant localized operational impacts. Impacts would be similar to the Project, which are less than significant with mitigation.

(2) Construction Emissions

(a) Regional and Localized Air Quality Impacts

As with the Project, construction of Alternative 2 has the potential to create air quality impacts through the use of heavy-duty construction equipment and vehicle trips generated by construction workers and haul trucks traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.B, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

New construction proposed under Alternative 2 would increase to approximately 1,820,875 square feet in comparison to the 1,667,010 square feet proposed under the Project. However, as development would be concentrated within the South Lot, the total area to be graded/excavated, as well as the associated amount of export required under Alternative 2, would be reduced in comparison to the Project. Specifically, Alternative 2 would result in approximately 896,000 cubic yards of cut (compared to 935,000 cubic yards under the Project) and approximately 49,000 cubic yards of fill (compared to 55,000 cubic yards under the Project), resulting in approximately 847,000 cubic yards of net export (compared to 880,000 cubic yards under the Project). As such, construction of Alternative 2 would require approximately four percent less import/export of soil during grading activities. Notwithstanding, while overall grading amounts would be reduced, building construction would be greater. As such, it is estimated that the overall duration of construction activities would be similar to the Project. In addition, given the nature of construction projects to advance as much of the work in any given day, it is anticipated that the intensity of grading and construction activities under Alternative 2 would also be similar to the Project on days when maximum construction activities occur. In particular, the daily on-site construction activities would be similar and the off-site truck trips would be somewhat reduced from approximately 448 trucks to approximately 427 trucks. As maximum daily conditions are used for measuring impact significance, the regional air emissions and associated air quality impacts of Alternative 2 on these days would be similar to those of the Project and would be significant and unavoidable. As with the Project, Alternative 2 would implement the same mitigation measures (see Mitigation Measures AIR-MM-1 through AIR-MM-4, as set forth in Section IV.B, Air Quality, of this Draft EIR) in order to reduce regional NO_X impacts. However,

as with the Project, implementation of mitigation measures would not reduce regional NO_X impacts to a less-than-significant level. Therefore, impacts associated with regional construction emissions under Alternative 2 would remain significant and unavoidable and similar to the Project's significant and unavoidable impacts.

With regard to localized air quality impacts, while no construction activities would occur on the North Lot under Alternative 2, construction activities under Alternative 2 occurring on the South Lot would be located at similar distances from sensitive receptors as under the Project. Since air emissions and fugitive dust from construction activities would be similar to those of the Project on maximum construction activity days, localized emissions under Alternative 2 would also be similar to those of the Project and would be potentially significant (related to the emissions of PM_{10} and $PM_{2.5}$). As with the Project, Alternative 2 would incorporate Mitigation Measures AIR-MM-1 and AIR-MM-2 to reduce these impacts. Therefore, similar to the Project, localized impacts under Alternative 2 would be less than significant after mitigation.

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 2 would generate DPM emissions associated with heavy equipment operations during grading and excavation activities. These activities would represent the greatest potential for TAC emissions. As discussed in Section IV.B, Air Quality, of this Draft EIR, the Project would result in less-than-significant construction impacts with regard to TAC emissions. As previously described above, Alternative 2 would involve less grading activities and increased building construction, resulting in a similar construction duration and similar air emissions in comparison to the Project. Thus, impacts due to construction-related TAC emissions and the corresponding individual cancer risk under Alternative 2 would be less than significant and similar to the Project's less-than-significant impacts.

(3) Operational Emissions

(a) Regional and Localized Air Quality Impacts

Similar to the Project, operational regional air emissions under Alternative 2 would be generated by vehicle trips to the Project Site and the consumption of natural gas. As discussed in the Alternatives Transportation Memorandum provided in Appendix R.1 of this Draft EIR, development of Alternative 2 would result in an estimated 17,933 daily vehicle trips compared to an estimated 16,435 daily vehicle trips under the Project, resulting in a corresponding nine-percent increase in total daily VMT compared to the Project (an estimated 119,921 total daily VMT under Alternative 2 compared to an estimated

109,996 total daily VMT under the Project).[4] As vehicular emissions depend on the number of trips and VMT, vehicular sources associated with Alternative 2 would result in a corresponding increase in air emissions compared to the Project. In addition, because the overall square footage would also be increased in comparison to the Project, the demand for electricity and natural gas would be greater than the Project.

Further, with the increase in square footage and vehicle trips, Alternative 2 would result in an increase in VOC emissions from consumer products and vehicle emissions. Therefore, regional operational emissions of VOC under Alternative 2 would result in new significant and unavoidable air quality impacts that would not occur under the Project.[5] As such, impacts associated with regional operational VOC emissions under Alternative 2 would be significant and unavoidable and greater than the Project's less-than-significant impacts.

With regard to on-site localized area source and stationary source emissions, as with the Project, Alternative 2 would not introduce any major new sources of air pollution within the Project Site. Therefore, similar to the Project, localized impacts from on-site emission sources associated with Alternative 2 would also be less than significant. However, such impacts would be greater than those of the Project due to the overall increase in net new building square footage.

Localized mobile source operational impacts are determined mainly by peak-hour intersection traffic volumes. As discussed above, Alternative 2 would result in an increase in daily vehicle trips when compared to the Project, which would correspond to an increase in peak-hour trips. However, as with the Project, localized mobile source impacts associated with Alternative 2 operations would be less than significant as shown in Appendix R.2. However, such impacts would be greater than the Project's less-than-significant impacts due to the increased vehicle emissions.

(b) Toxic Air Contaminants

As discussed in Section IV.B, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include DPM from delivery trucks. As this alternative would include an increase in floor area compared to the Project, the number of delivery trucks would also be increased in comparison to the Project. Also discussed in Section IV.B, Air Quality, of this Draft EIR, SCAQMD recommends that an HRA be conducted for sites which generate more than 100 trucks day. The Project would generate less than 40 heavy duty trucks per day and would not be considered a substantial source of TAC

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[4] *Gibson Transportation Consulting, Inc., Transportation Assessment for the Radford Studio Center Project, Studio City, California, July 2024, revised January 2025. Refer to Appendix O.1 of this Draft EIR.*

[5] *Refer to the air quality calculations provided in Appendix R.2 of this Draft EIR.*

emissions. As truck trip generation is related to building square footage, the increase in floor area under Alterative 2 in comparison to the Project would not result in more than 100 trucks per day. Therefore, the number of additional daily delivery trucks under Alternative 2 would not result in a substantial increase in the amount of DPM that could result in a new impact.

Additionally, as with the Project, the types of uses proposed under Alternative 2 are not considered land uses that generate substantial TAC emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities).[6] As with the Project, typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not proposed under Alternative 2. Similar to the Project, Alternative 2 would not release substantial amounts of TACs and would be consistent with California Air Resources Board (CARB) and South Coast Air Quality Management District (SCAQMD) guidelines regarding TAC sources in proximity to existing sensitive land uses. Thus, as with the Project, potential TAC impacts under Alternative 2 would be less than significant. However, such impacts would be greater than the Project's less-than-significant impacts due to the increase in floor area and associated increase in delivery trucks.

(4) Concurrent Construction and Operation

In the event of a long-term buildout scenario, as with the Project, portions of the Project Site under Alternative 2 could be completed and occupied while construction of other Project components occurs. The intensity of this interim year air quality impact would remain similar to the Project under Alternative 2 since the intensity of construction activity (i.e., the pace at which construction occurs and the equipment used on a daily basis) and the balance of completed and occupied components would be similar. However, the square footage under construction under Alternative 2 would be greater in comparison to the Project, resulting in increased VOC emissions from architectural coating (painting) activities. Under Alternative 2, concurrent construction and operational VOC emissions would still exceed SCAQMD regional thresholds after mitigation, resulting in a significant and unavoidable impact as compared to the Project's less-than-significant impact after mitigation. As with the Project, concurrent construction and operational NO_X emissions would also exceed SCAQMD regional thresholds, resulting in a significant and unavoidable impact. Therefore, concurrent construction and operational regional air quality impacts under Alternative 2 are expected to be significant and unavoidable (related to the emissions of VOC and NO_X) and greater when compared to the Project's significant and unavoidable impact (related to the emission of NO_X only) since the overall amount of construction and operation would be increased under this alternative.

[6] *CARB, Air Quality and Land Use Handbook, a Community Health Perspective, April 2005.*

c. Biological Resources

(1) Special Status Species

As discussed in Section IV.C, Biological Resources, of this Draft EIR, there is no special status vegetation within the Project Site and impacts with regard to special status vegetation would be less than significant.

With regard to special status wildlife, two special status wildlife species, the big free-tailed bat and the western mastiff bat, and one species of local concern, the California towhee, have the potential to forage and/or roost within the Project Site. As discussed in Section IV.C, Biological Resources, of this Draft EIR, although habitat conditions on the Project Site are not ideal due to the level of disturbance in general and minimal availability of open space, there is a moderate likelihood for both bat species to forage and/or roost throughout the Project Site. While temporary loss of habitat is not likely to affect regional populations of these two bat species, construction activities, such as building demolition, tree removal, and demolition of other structures on the Project Site, may result in direct mortality of bats or untimely abandonment of a roost. As such, impacts on these species would be potentially significant.

Due to the abundance of California towhee throughout the region, and the low likelihood for direct mortality due to species mobility, and the extremely minimal loss of suitable habitat, impacts on this species would be less than significant.

As previously described, development of Alternative 2 would occur within the South Lot only. As such, potential impacts to the special status wildlife species found within the Project Site would be reduced compared to the Project since Alternative 2 would result in the removal of fewer trees and buildings. In addition, as with the Project, Alternative 2 would implement the same mitigation measure as the Project (see Mitigation Measure BIO-MM-1, as set forth in Section IV.C, Biological Resources, of this Draft EIR) to reduce potential impacts related to special-status wildlife species. Therefore, as with the Project, Alternative 2 would result in less-than-significant impacts after mitigation with respect to impacts to candidate, sensitive, or special status species. However, such impacts would be less when compared to the Project's less-than-significant impacts after mitigation due to the reduced construction footprint.

(2) Protected Wetlands

As described in Section IV.C, Biological Resources, of this Draft EIR, there are no federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) as defined by Section 404 of the Clean Water Act within or adjacent to the Project Site.

Therefore, similar to the Project, no impacts with respect to protected wetlands would occur under Alternative 2.

However, there are two jurisdictional features, which are regulated by the USACE, RWQCB, and CDFW, that pass through the Project Site—the Los Angeles River and Tujunga Wash. Similar to the Project, the Applicant would consult with these agencies and prepare and process the required permits associated with construction of Alternative 2. As such, as with the Project, through compliance with applicable regulatory requirements, Alternative 2 would result in less-than-significant impacts on jurisdictional features, and such impacts would be similar when compared to the Project's less-than-significant impacts.

(3) Wildlife Movement

As with the Project, development under Alternative 2 would not occur within or adjacent to a recognized regional wildlife corridor as none currently exist within or adjacent to the Project Site. As with the Project, development under Alternative 2 would involve clearing portions of the Project Site, including removal of certain buildings, landscaping, and trees, which could potentially be used by nesting birds. However, this impact would be reduced when compared to the Project as the North Lot would not be developed under Alternative 2. Furthermore, as with the Project, Alternative 2 would implement Project Design Feature BIO-PDF-2, which would ensure that construction of Alternative 2 would not interfere substantially with the movement of any migratory birds that may nest in the trees within and surrounding the Project Site. Overall, Alternative 2 would result in less-than-significant impacts with respect to wildlife movement, and such impacts would be less when compared to the Project's less-than-significant impacts due to the reduced construction footprint and associated disturbance limited to the South Lot.

(4) Conflict with Local Policies Protecting Biological Resources

As discussed in Section IV.C, Biological Resources, of this Draft EIR, a number of existing City policies or ordinances, including the City's General Plan (i.e., the Framework Element, Conservation Element, Open Space Element, and the Community Plan), the City's Tree Protection Ordinance, the City's RIO District Ordinance landscaping requirements, the City's LARRMP, and the County's Landscaping Guidelines, protecting biological resources are applicable to the Project Site. As with the Project, since Alternative 2 would be developed within the Project Site, the same policies and ordinances would be applicable to Alternative 2. As detailed in Section IV.C, Biological Resources, of this Draft EIR, the Project would generally not conflict with the policies applicable to the Project Site, except for the potential to impact protected trees, which could potentially conflict with the City's Tree Protection Ordinance. However, with implementation of mitigation that addresses the protection of trees during construction, impacts would be reduced to less than significant. As previously discussed, Alternative 2 would also be developed within the Project Site, and development

would occur within the South Lot only (i.e., the North Lot would not be developed under Alternative 2). As with the Project, Alternative 2 would implement Mitigation Measure BIO-MM-2, which would reduce potential impacts related to conflicts with local policies or ordinances protecting biological resources to less-than-significant levels. Therefore, as with the Project, Alternative 2 would generally not conflict with applicable local policies or ordinances protecting biological resources (trees), and such impacts would be less than significant. With the reduced construction footprint requiring the removal of fewer trees compared to the Project, such impacts would be less when compared to the Project's less-than-significant impact after mitigation.

d. Cultural Resources

(1) Historical Resources

As detailed in Section IV.D, Cultural Resources, of this Draft EIR, the Project Site includes three potentially historic structures (i.e., the Mill Building, the Administration Building, and Stage 2), as well as the potential Mack Sennett Historic District. As illustrated in Figure 5 in the Historical Resources Report included in Appendix F.1 of this Draft EIR, these potential historic resources are all located on the South Lot. As discussed in Section IV.D, Cultural Resources, of this Draft EIR, Project impacts to these historical resources would be less than significant after mitigation.

As with the Project, Alternative 2 would remove five buildings within the boundary of the potential Mack Sennett Historic District, two of which have been identified as contributors. Although the buildings are representative of support functions, characteristic of independent motion picture studios during the Major Studio Era, the buildings are not critical to understanding the historic significance of the Potential Mack Sennett Historic District, and the Historic District would still convey its significance with their removal. Thus, similar to the Project, potential impacts associated with the removal of contributing buildings would be less than significant.

As with the Project, Alternative 2 would involve the relocation and rehabilitation of the Arts/HR Building, a contributor to the potential Mack Sennett Historic District. Alternative 2 would also rehabilitate the Mack Sennett Building, the Administration Building, and Stage 2. However, Alternative 2 would not permanently relocate the Mill Building, which is eligible for listing in the National Register and California Register and for designation as a Los Angeles HCM, as proposed by the Project. Rather, under Alternative 2, the Mill Building would be temporarily relocated to accommodate construction of the below-grade parking structure and then returned to its original location. In addition, Alternative 2 would implement the same mitigation measures as the Project (see Mitigation Measures CUL-MM-1 through CUL-MM-20, as set forth in Section IV.D, Cultural Resources, of this Draft EIR) in order to reduce potential impacts from the proposed relocation and rehabilitation of historic

buildings. As with the Project, potential impacts associated with relocation and rehabilitation of buildings would be reduced to less-than-significant levels after mitigation under Alternative 2. However, such impacts would be less than those of the Project as Alternative 2 would relocate the Mill Building back to its original context.

With respect to new construction, although Alternative 2 would include taller buildings than the Project, development of Alternative 2 would be concentrated within the South Lot, and as with the Project, would not materially impair the significance of any historical resources located on the Project Site. Thus, similar to the Project, the potential impact from new construction would be less than significant.

Overall, as with the Project, Alternative 2 would result in less-than-significant impacts after mitigation with respect to historical resources, but such impacts would be less when compared to the Project's less-than-significant impacts after mitigation as Alternative 2 would not permanently relocate the Mill Building.

(2) Archaeological Resources

As detailed in Section IV.D, Cultural Resources, of this Draft EIR, the SCCIC records search did not identify any known archaeological resources within the Project Site. However, the geoarchaeological investigation conducted as part of the Archaeological Resources Assessment, included as Appendix F.2 of this Draft EIR, indicates that, while no artifacts were found, the Project Site may contain historical-period and prehistoric archaeological deposits. As such, there is high sensitivity for buried archaeological resources within the Project Site. As discussed in Section IV.D, Cultural Resources, of this Draft EIR, the Project's impacts on archaeological resources were concluded to be less than significant after mitigation (see Mitigation Measures CUL-MM-21 and CUL-MM-22).

As previously described, when compared to the Project, Alternative 2 would concentrate development within the South Lot only. As such, while the maximum excavation depth of 50 feet would be similar to the Project, earthwork activities under Alternative 2 would be reduced compared to the Project and would include approximately 896,000 cubic yards of cut as compared to the approximately 935,000 cubic yards of cut under the Project. Nonetheless, it is possible that excavation activities associated with Alternative 2 would also involve intact native sediment that may contain archaeological deposits. However, Alternative 2 would comply with the same regulatory requirements and implement the same mitigation measures as the Project. Accordingly, as with the Project, potential impacts to archaeological resources under Alternative 2 would be less than significant after mitigation. However, with the reduced construction footprint and reduced area of disturbance and associated reduction in earthwork activities due to no new development within the North Lot, such impacts would be less when compared to the Project's less-than-significant impacts after mitigation.

(3) Human Remains

With regard to human remains, no known traditional burial sites have been identified on the Project Site. Section IV.D, Cultural Resources, of this Draft EIR concludes that through compliance with applicable regulatory requirements, potential impacts to human remains would be less than significant. As with the Project, potential impacts under Alternative 2 would be less than significant but would be less when compared to the Project's less-than-significant impact due to the reduced cut activities resulting from no new development within the North Lot.

e. Energy

(1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

As with the Project, construction activities associated with Alternative 2 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be greater compared to the Project as the overall amount of construction would increase compared to the Project. However, as with the Project, construction activities under Alternative 2 would comply with all applicable regulatory requirements relating to energy use. Therefore, as with the Project, short-term energy use during construction of Alternative 2 would not occur in a wasteful, inefficient or unnecessary manner, and impacts would be less than significant. However, such impacts would be greater when compared to the Project's less-than-significant impact due to the construction of a larger development.

As with the Project, operation of Alternative 2 would generate an increase in the consumption of electricity and petroleum-based fuels compared to existing conditions. Alternative 2 would result in a net reduction in natural gas consumption due to compliance with the All-Electric Buildings Ordinance. Alternative 2 would result in greater operational energy demand than the Project due to the increase in floor area under this alternative. Alternative 2 would also include energy saving features, including solar. LADWP and SoCalGas have confirmed that the electrical and natural gas infrastructure in the Project Site area has adequate capacity to serve the Project. Although Alternative 2 would have increased floor area in comparison to the Project, Alternative 2 would not be substantially larger than the Project; thus, adequate capacity would also be available to serve Alternative 2.

In addition, since the number of daily trips generated by this alternative would be greater in comparison to the Project, fuel usage would also increase compared to the Project. Notwithstanding, as with the Project, Alternative 2 would comply with applicable energy

efficiency standards, and new buildings would be developed to the latest energy efficiency standards. Therefore, as with the Project, long-term energy use during operation of Alternative 2 would not occur in a wasteful, inefficient, or unnecessary manner, and impacts would be less than significant. However, with the increased use of energy resources, such impacts would be greater when compared to the Project's less-than-significant impact.

(2) Conflict with Plans for Renewable Energy or Energy Efficiency

As discussed above, Alternative 2 would result in increased operational energy demand in comparison to the Project due to the increased floor area under this alternative. Notwithstanding, as with the Project, Alternative 2 would comply with applicable energy efficiency standards, and the development would represent an infill project within an urbanized area that is well-served by public transportation, thus contributing to an energy efficient land use pattern consistent with SCAG's 2024–2050 RTP/SCS growth forecast. Therefore, similar to the Project, Alternative 2 would not conflict with plans or policies regarding renewable energy and energy efficiency, and Alternative 2 would result in less-than-significant impacts.

f. Geology and Soils

(1) Geologic Hazards

The Project Site is located within the seismically active region of Southern California. As discussed in Section IV.F, Geology and Soils, of this Draft EIR, with compliance with applicable regulatory requirements, Project impacts associated with geologic hazards would be less than significant. As previously described, Alternative 2 would continue to be developed within the Project Site; however, development of Alternative 2 would be concentrated on the South Lot, whereas the Project would be constructed within both the North Lot and the South Lot. Thus, under Alternative 2, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, liquefaction, seismically induced settlement, and subsidence, would be reduced compared to those under the Project since geologic hazard impacts are a function of a site's underlying geologic conditions rather than the type of land uses or amount of development proposed, and the development area under Alternative 2 would be reduced compared to the Project. As with the Project, Alternative 2 would be subject to all applicable regulations, including the applicable provisions in the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the California Building Code, the City's General Plan Safety Element, and the Los Angeles Building Code. Furthermore, as with the Project, Alternative 2 would be required to demonstrate compliance with the applicable provisions of these safety requirements before permits can be issued for construction. Accordingly, Alternative 2 would comply with all applicable regulatory requirements, including applicable provisions of the Los Angeles Building Code relating to seismic safety, and accepted and proven construction

engineering practices would be implemented, including the geotechnical design recommendations set forth in a development-specific geotechnical investigation and similar to Project Design Feature GEO-PDF-1 included for the Project in Section IV.F, Geology and Soils, of this Draft EIR.

Overall, impacts related to geology and soils under Alternative 2 would be less than significant, and such impacts would be similar to the Project's less-than-significant impacts.

(2) Paleontological Resources

As discussed in Section IV.F, Geology and Soils, of this Draft EIR, a records search at the NHMLA did not identify any known paleontological resources within the Project Site. However, as evaluated in the Paleontological Resources Report included as Appendix H.3 of this Draft EIR, both Pleistocene-age alluvial fan deposits underlying the Project Site and the nearby Modelo Formation have produced significant fossil specimens and are, therefore, assigned a high paleontological potential. As discussed in Section IV.F, Geology and Soils, of this Draft EIR, with implementation of Mitigation Measure GEO-MM-1, potential Project impacts associated with uncovering of paleontological resources would be reduced to less-than-significant levels.

As previously described, development of Alternative 2 would be concentrated within the South Lot, and no new development would occur on the North Lot as compared to the Project, which would include development on both the North Lot and the South Lot. As such, while the maximum excavation depth of 50 feet would be similar to the Project, earthwork activities under Alternative 2 would be reduced compared to the Project and would include approximately 896,000 cubic yards of cut as compared to the approximately 935,000 cubic yards of cut under the Project and no new development would occur within the North Lot. Alternative 2 would also comply with the same applicable regulatory requirements as the Project and would implement similar mitigation as the Project to address potential impacts to paleontological resources. As such, as with the Project, impacts to paleontological resources under Alternative 2 would be less than significant after mitigation. However, such impacts would be less when compared to the Project's less-than-significant impacts after mitigation as Alternative 2 would not include excavation within the North Lot.

g. Greenhouse Gas Emissions

(1) Construction

Under Alternative 2, the overall amount of new construction would increase in comparison to the Project (i.e., a total of 1,820,875 square feet under Alternative 2 as compared to 1,667,010 square feet under the Project). However, construction of Alternative 2 would require approximately four percent less import/export of soil during grading activities.

With the same types of uses proposed under Alternative 2 as the Project, the mix of construction equipment and emissions factors would be the same for Alternative 2 as the Project. Thus, while the overall construction duration of Alternative 2 would be similar to the Project, increased construction activities would occur throughout the duration of the construction period due to the increased amount of development proposed under Alternative 2. However, grading activities would be reduced in comparison to the Project. As with the Project, GHG emissions over the construction duration of Alternative 2 would be less than significant; and such impacts would be similar to the Project's less-than-significant impacts.

(2) Operation

As discussed in Section IV.G, Greenhouse Gas Emissions, of this Draft EIR, GHG emissions from a development project are determined in large part by the number of daily trips generated and the energy consumption associated with the proposed land uses. As discussed above, Alternative 2 would include more floor area, consume more energy, and generate greater daily vehicle trips compared to the Project. Thus, the amount of GHG emissions generated by Alternative 2 would be greater than the Project. As with the Project, Alternative 2 would be designed to comply with the Los Angeles Green Building Ordinance and All-Electric Buildings Ordinance, as applicable, and would incorporate sustainability features to reduce GHG emissions. Specifically, as with the Project, Alternative 2 would be designed to meet LEED Gold or equivalent green building standards, and rooftop solar panels would be provided on-site. Furthermore, as with the Project, Alternative 2 would represent infill development within an urban area that is well-served by public transportation and, thus, would contribute to an energy efficient land use pattern, which would support the goals of the RTP/SCS intended to reduce GHG emissions. Therefore, as with the Project, Alternative 2 would be consistent with the applicable GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans, and GHG emissions impacts would be less than significant. However, such impacts would be greater when compared to the Project's less-than-significant impacts due to the increased GHG emissions generated by Alternative 2, resulting from a larger development.

h. Hazards and Hazardous Materials

(1) Construction

As with the Project, hazardous materials, such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, would be used and, therefore, would require proper handling, management, and, in some cases, disposal. As discussed for the Project in Section IV.H, Hazards and Hazardous Materials, of this Draft EIR, all potentially hazardous materials required during construction of Alternative 2 would also be handled and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing associated risks. As such,

similar to the Project, impacts associated with the use of hazardous materials during construction would be less than significant.

With regard to potential risk of accident or upset conditions, while Alternative 2 would involve the same types of construction activities as the Project, Alternative 2 would remove fewer structures and would not involve any construction activities on the North Lot. As such, the potential to encounter asbestos containing materials (ACMs), lead based paint (LBP), contaminated soil, and contaminated groundwater would be reduced compared to the Project. Additionally, as with the Project, Alternative 2 would comply with all applicable regulatory requirements related to hazards, and Alternative 2 would implement the same mitigation measure as the Project, requiring a Soil Management Plan and Health and Safety Plan, as well as the same design features (e.g., requiring an updated Spill Prevention, Control, and Countermeasure Plan). Thus, as with the Project, under Alternative 2, potential impacts associated with risk of hazards and emission or handling of hazardous waste within 0.25 miles of a school during construction would be less than significant after mitigation. Such impacts would be less when compared to the Project's less-than-significant impact after mitigation due to the lack of construction on the North Lot.

With respect to the Project Site's listing on a hazardous materials site, as discussed in Section IV.H, Hazards and Hazardous Materials, of this Draft EIR, the Project Site is recorded on the "HIST CORTESE" list of sites compiled pursuant to Government Code Section 65962.5 in reference to the LUST file closed by the Los Angeles Regional Water Quality Control Board (LARWQCB) in January of 1997. This case was associated with underground storage tanks (USTs) damaged during the Northridge Earthquake. The five USTs were removed in 1994 under a permit by the LAFD. Impacted soil was removed for off-site disposal, and groundwater monitoring was required by the LARWQCB in May of 1994. Monitoring of soil vapor and groundwater was conducted, and the LARWQCB closed the Leaking Underground Storage Tanks (LUST) file in January of 1997. As set forth in Section IV.H, Hazards and Hazardous Materials, of this Draft EIR, implementation of Mitigation Measure HAZ-MM-1 would reduce any potential impacts associated with this case to a less-than-significant level. As with the Project, Alternative 2 would implement the same mitigation measure. Thus, similar to the Project, potential impacts associated with listing on a hazardous materials site would be less than significant after mitigation.

Overall, similar to the Project, impacts related to hazards and hazardous materials during construction of Alternative 2 would be less than significant after mitigation.

(2) Operation

As with the Project, operation of Alternative 2 would involve the use of limited quantities of potentially hazardous materials typical of those used in studio campuses, including paints, adhesives, fuels, pesticides for landscaping, cleaning and maintenance

supplies, materials for pyrotechnic special effects, and other general products related to studio operations. As Alternative 2 would increase the floor area as compared to the Project, Alternative 2 could involve a greater use of potentially hazardous materials than the Project. However, as with the Project, as discussed in Section IV.H, Hazards and Hazardous Materials, of this Draft EIR, all hazardous materials on the Project Site under Alternative 2 would be handled, used, stored, and disposed of in accordance with all applicable local, state, and federal regulations. As with the Project, Alternative 2 would include design features requiring the preparation or updating of safety and emergency plans. Such safety and emergency plans would include the Spill Prevention, Control, and Countermeasure Plan (SPCCP), the Radford Studio Center Emergency Action Plan, and the Radford Studio Center Injury and Illness Prevention Program (IIPP), including the Radford Studio Center Safety Manual. Overall, potential impacts associated with hazardous materials use and the resultant potential risk of upset during operation of Alternative 2 would be less than significant. Such impacts would be greater when compared to the Project's less-than-significant impacts as a result of the overall increase in development and related increase in the use of potentially hazardous materials.

i. Hydrology and Water Quality

(1) Surface Water Quality

(a) Construction

As previously described, Alternative 2 would involve a reduced construction footprint compared to the Project as development would be concentrated on the South Lot and the North Lot would not be developed. However, as with the Project, construction activities associated with Alternative 2 would have the potential to temporarily alter existing drainage patterns and flows on the South Lot by exposing the underlying soils, modifying flow direction, and making the South Lot temporarily more permeable. Alternative 2 would similarly require a maximum excavation depth of approximately 50 feet as with the Project and, as such, temporary dewatering may be required within the South Lot. Like the Project, no dewatering is anticipated on the North Lot because groundwater depths are below the proposed excavation depth. As such, the area where dewatering could occur would be similar to the Project since development of Alternative 2 would be located on the South Lot. Like the Project, in accordance with the requirements of the NPDES Construction General Permit, a SWPPP would be prepared for Alternative 2 which would specify BMPs to be used during construction to manage stormwater and non-stormwater discharges. In addition, in the event dewatering is required, as with the Project, temporary dewatering pumps and filtration would be used during construction of Alternative 2 in compliance with the NPDES permit. These temporary systems would comply with all applicable NPDES requirements related to construction and discharges from dewatering operations, as well as the LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties.

With the implementation of SWPPP and site-specific BMPs, Alternative 2 would reduce or eliminate the discharge of potential pollutants into stormwater runoff. In addition, construction of Alternative 2 would be required to comply with City grading permit regulations, which require the preparation and implementation of necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspections to reduce sedimentation and erosion. Furthermore, Alternative 2 would also be subject to Los Angeles County Flood Control District permit requirements, which prohibit construction within the channel during the rainy season (October 15 to April 15) and require that at least 33 percent of the channel be available for flow through with a temporary diversion for the remainder of the year.

Overall, with compliance with NPDES requirements, site-specific BMPs included as part of the SWPPP, and all applicable City and County of Los Angeles regulations, construction of Alternative 2 would not result in discharges that violate any water quality standard or waste discharge requirements or otherwise substantially degrade water quality. Therefore, as with the Project, construction-related impacts to surface water quality under Alternative 2 would be less than significant. However, such impacts would be reduced compared to the less-than-significant impacts of the Project due to the reduced construction area.

(b) Operation

As is typical of most urban developments, stormwater runoff from a site has the potential to introduce pollutants such as sediment, nutrients, pesticides, metals, pathogens, oil, and grease into the stormwater system. Due to the increase in total floor area of the proposed development, Alternative 2 could generate more of these types of pollutants compared to the Project. However, similar to the Project, Alternative 2 would implement BMPs for managing stormwater runoff in accordance with the City's LID Ordinance requirements. Due to the incorporation of the LID BMPs, operation of Alternative 2 would not result in discharges that would violate any surface water quality standards or waste discharge requirements, nor would Alternative 2 create substantial additional sources of polluted runoff, which could substantially degrade surface water quality. Thus, as with the Project, impacts to surface water quality during operation of Alternative 2 would be less than significant, however such impacts would be greater than the less-than-significant impacts of the Project as Alternative 2 would result in a net increase of 1,220,890 square feet of floor area (compared to 1,020,890 square feet under the Project.

(2) Groundwater Quality

(a) Construction

Similar to the Project, Alternative 2 could require temporary dewatering during construction. However, the amount of dewatering under Alternative 2 would be similar to the

Project since development of Alternative 2 would be located on the South Lot where all dewatering would occur. In addition, as with the Project, any dewatering required under Alternative 2 would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit and applicable LARWQCB requirements.

As discussed in Section IV.H, Hazards and Hazardous Materials, of this Draft EIR, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and, therefore, would require proper management and, in some cases, disposal. The management of any resultant hazardous wastes that may be encountered could increase the potential for hazardous materials to be released into groundwater if these materials are released while the site soils are exposed. As with the Project, Alternative 2 would comply with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste. With compliance with all applicable regulations, the potential for the construction of Alternative 2 to release contaminants into groundwater that could affect existing contaminants, expand the area of groundwater contamination, or increase the level of contamination would be reduced. In addition, as there are no existing groundwater production wells or public water supply wells within 1 mile of the Project Site, construction activities would not be anticipated to affect existing wells. Therefore, while Alternative 2 would require more construction activities when compared to the Project due to the increased floor area, which could result in an increased use of hazardous materials, the impacts to groundwater quality would be anticipated to be similar since construction activities would be limited to the South Lot.

In addition, like the Project, Alternative 2 would have the potential to encounter contaminated soils, which could potentially affect groundwater. However, as with the Project, any contaminated soils found during excavation would be captured within the volume of excavated material and would be removed from the site and remediated at an approved disposal facility in accordance with applicable regulatory requirements. Lastly, as there are no oil wells on the Project Site, construction activities under Alternative 2 also would not disturb existing oil wells which could impact groundwater quality.

Based on the above, overall impacts with respect to groundwater quality during construction under Alternative 2 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(b) Operation

As discussed in Section IV.I, Hydrology and Water Quality, of this Draft EIR, in general, operational activities that could affect groundwater quality include spills of hazardous materials and leaking USTs. As discussed in Section IV.I, Hazards and Hazardous Materials, of this Draft EIR, no USTs are currently operated at the Project Site. Therefore, as with the Project, Alternative 2 would not disturb existing USTs, and Alternative

2 would not introduce any new USTs that would have the potential to expose groundwater to contaminants. In addition, as with the Project, Alternative 2 would incorporate source control measures, including good housekeeping, removal of trash and maintenance of driveways and parking areas, and proper use and storage of pesticides, which would reduce water quality impacts and prevent pollutants from entering the groundwater by percolation within landscaped areas or other permeable surfaces. Overall, as with the Project, impacts with respect to groundwater quality during operation of Alternative 2 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(3) Surface Water Hydrology

(a) Construction

As previously discussed, Alternative 2 would involve a reduced area of construction as compared to the Project as the North Lot would not be further developed as part of Alternative 2. Notwithstanding, as with the Project, construction activities within the South Lot would have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Similar to the Project, Alternative 2 would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, Alternative 2 would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows. In addition, Alternative 2 construction activities would be required to comply with all applicable City grading permit regulations, which require the preparation and implementation of necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspections to reduce sedimentation and erosion. Furthermore, Alternative 2 would also be subject to Los Angeles County Flood Control District permit requirements, which prohibit construction within the channel during the rainy season (October 15 to April 15) and require that at least 33 percent of the channel be available for flow through with a temporary diversion for the remainder of the year. Thus, through compliance with all NPDES Construction General Permit requirements, including the preparation of a SWPPP, implementation of BMPs, as well as compliance with applicable City grading permit regulations, Alternative 2 would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, or flooding on- or off-site. Therefore, construction-related impacts to surface water hydrology under Alternative 2 would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project due to the overall reduction in the area of construction.

(b) Operation

Alternative 2 would include the development of new buildings, paved areas, and landscaped areas within the South Lot. As with the Project, it is anticipated that Alternative 2 would decrease impervious surfaces on the South Lot compared to existing conditions with the implementation of new landscaped areas and other pervious areas. Notwithstanding, with the introduction of new landscaped areas and other pervious areas as part of Alternative 2 as well as incorporation of BMPs in accordance with the City's LID requirements, the overall runoff flow volume would decrease compared to existing conditions although not to the same extent as the Project. Overall, operation of Alternative 2 would not substantially alter the existing drainage pattern of the South Lot or surrounding area such that substantial erosion, siltation, or on- or off-site flooding would occur. In addition, Alternative 2 would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, operational impacts to surface water hydrology under Alternative 2 would be less than significant, but such impacts would be greater than the less-than-significant impacts of the Project.

(4) Groundwater Hydrology

(a) Construction

As previously discussed, as with the Project, Alternative 2 would similarly require a maximum excavation depth of approximately 50 feet and, as such, temporary dewatering may be required. However, the area where dewatering could occur would be reduced compared to the Project since development of Alternative 2 would be located on the South Lot and the North Lot would not be further developed. Therefore, the resultant amount of groundwater potentially to be removed would be reduced compared to the Project. As concluded in Section IV.I, Hydrology and Water Quality, of this Draft EIR, the quantity of groundwater removed via dewatering for the Project would not interfere with any groundwater supply pumping in the vicinity of the Project Site. Furthermore, no water supply wells are located at the Project Site or within one mile of the Project Site that could be impacted by construction. Accordingly, as Alternative 2 would reduce the construction area where dewatering could occur and result in an associated reduction in the amount of groundwater removed, construction impacts on groundwater hydrology during construction of Alternative 2 would be less than significant. Such impacts would be less than the less-than-significant impacts of the Project due to the reduced area of construction.

(b) Operation

As with the Project, it is anticipated that Alternative 2 would decrease impervious surfaces on the South Lot compared to existing conditions due to the implementation of new landscaping and other pervious areas. Notwithstanding, as with the Project, Alternative 2

would include the installation of BMPs in accordance with the City's LID requirements in order to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site. As discussed for the Project in Section IV.I, Hydrology and Water Quality, of this Draft EIR, regardless of the BMPs ultimately installed within the South Lot for Alternative 2, a portion of the stormwater would be captured to be infiltrated into the ground while the excess stormwater would bypass the BMP systems and discharge to the Los Angeles River through an existing or proposed piped connection. This excess stormwater would not have the opportunity to discharge or infiltrate into the ground and would thus not affect groundwater hydrology, including the direction of groundwater flow. Therefore, as with the Project, Alternative 2 would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management, and impacts on groundwater hydrology during operation of Alternative 2 would be less than significant. Such impacts would be similar to the less-than-significant impacts of the Project.

j. Land Use and Planning

Alternative 2, the Development in Accordance with Existing Zoning Alternative, considers development of the Project Site in accordance with the applicable existing zoning and land use regulations for the Project Site. Therefore, similar to the Project, Alternative 2 would not conflict with applicable plans, policies, and regulations that were adopted for the purpose of avoiding or mitigating an environmental effect, including, but not limited to, the City's General Plan Framework Element, Community Plan, LAMC, and SCAG's 2024–2050 RTP/SCS. As such, the impacts of Alternative 2 related to potential conflicts with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project as this alternative would be constructed in accordance with existing land use and zoning requirements.

k. Noise

(1) Noise

(a) Construction

The types of construction activities and associated equipment under Alternative 2 would be substantially similar to the Project, although the amount of new construction activities would be increased due to the increase in total floor area under Alternative 2. As with the Project, construction of Alternative 2 would generate noise from the use of heavy-duty construction equipment, as well as from haul truck and construction worker trips. However, the on-site construction activities would be limited to the South Lot, and no construction activities would occur on the North Lot. Therefore, under Alternative 2, on-site construction activities and the associated construction noise levels would be less for

sensitive receptors located north of the Los Angeles River. Specifically, the estimated on-site construction noise levels at off-site receptor locations R1, R2, R8, R12, R13, R14, and R15 would be reduced by 9.2 dBA, 3.4 dBA, 8.1 dBA, 5.6 dBA, 9.5 dBA, 7.7 dBA, and 3.4 dBA, as compared to the noise levels of the Project. The on-site construction noise levels at sensitive receptors south of the Los Angeles River (receptor locations R3 through R11) would be similar to the Project. As such, noise levels associated with on-site construction activities would be less than those of the Project.

With the reduction in earthwork activities, Alternative 2 is also expected to reduce the number of truck trips on peak construction days (i.e., 434 trucks versus 448 trucks per day under the Project). Therefore, noise levels associated with off-site trucks would be slightly reduced under Alternative 2, and would range from 0.1 dBA (L_{eq}) lower along Laurel Canyon Boulevard, Ventura Boulevard, and Radford Avenue and 0.2 dBA (L_{eq}) lower along Moorpark Street and Colfax Avenue, as compared to the Project. However, the estimated off-site construction noise level along Radford Avenue would still exceed the significance threshold by up to 5 dBA (L_{eq}). Noise impacts associated with off-site improvements under Alternative 2 would be similar to the Project. Additionally, Alternative 2 would implement Mitigation Measures NOI-MM-1 and NOI-MM-2, set forth in Section IV.K, Noise, of this Draft EIR, which would minimize construction noise. Nonetheless, on- and off-site construction noise impacts (both Project-level and cumulative) would be significant and unavoidable under Alternative 2. However, such impacts would be less than the Project's significant and unavoidable impacts since construction noise would not occur within the North Lot and the number of truck trips would be reduced.

(b) Operation

As discussed in Section IV.K, Noise, of this Draft EIR, for the Project, sources of operational noise would include on-site stationary noise sources, including mechanical equipment, outdoor studio production activities (outdoor production and basecamp), parking facilities, loading docks, and trash compactors; and off-site mobile (roadway traffic) noise sources. Alternative 2 would introduce similar noise sources as the Project. However, it is anticipated that with the overall increase in total floor area under this alternative, the noise levels from building mechanical equipment, use of outdoor spaces, and parking facilities would be slightly increased on the South Lot while the North Lot would remain unchanged. Alternative 2 would implement design features similar to the Project, which would minimize on-site operational noise. As a result, as with the Project, operational on-site noise impacts under Alternative 2 would be less than significant. However, with the increased uses, such impacts would be slightly greater when compared to the less-than-significant impacts of the Project.

With regard to operational off-site (traffic) noise, Alternative 2 would generate greater operational vehicle trips than the Project due to the increase in floor area. The net increase

in vehicle trips (a net increase of 8,652 daily trips over existing conditions with the Project to 10,150 daily trips with Alternative 2) would result in an increase in off-site operational traffic-related noise levels under Alternative 2.[7] Specifically, the estimated off-site traffic noise under Alternative 2 would result in a maximum noise increase of 4.2 dBA (CNEL) along the roadway segment of Radford Avenue (between Moorpark Street and Woodbridge Street), as compared to the maximum noise increase of 3.7 dBA (CNEL) under the Project. Therefore, while off-site noise impacts under Alternative 2 would be less than significant, such impacts would be greater when compared to the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

As noted above, the types of construction activities and associated equipment under Alternative 2 would be similar to the Project. As discussed above, the on-site construction activities would be limited to the South Lot, and no construction activities would occur on the North Lot. Therefore, the on-site construction activities and the associated construction vibration levels would be less for sensitive receptors located north of the Los Angeles River (receptor locations R1, R2, R12, R13, R14, and R15). However, the vibration levels associated with on-site construction would be expected to be similar for receptors located south of the Los Angeles River (including receptor locations R3 through R11). As such, peak vibration levels generated by the on-site construction equipment under Alternative 2 would be less as compared to the Project. However, the vibration impacts associated with the off-site construction equipment, off-site improvements, and off-site haul trucks under Alternative 2 would be similar to the Project as similar off-site improvements would be required. Accordingly, construction activities under Alternative 2 would result in similar significant and unavoidable on- and off-site vibration impacts based on the significance threshold for human annoyance and less-than-significant on- and off-site vibration impacts based on the significance threshold for building damage as the Project. However, such impacts for on-site construction vibration would be less than those of the Project.

(b) Operation

As described in Section IV.K, Noise, of this Draft EIR, sources of vibration related to Project operations would include vehicle circulation, delivery trucks, and building mechanical equipment. These same sources of operational vibration would occur under Alternative 2. As with the Project, vehicular-induced vibration from Alternative 2, including vehicle circulation within the subterranean parking areas, would not generate perceptible vibration

[7] *Net daily trips increase equal to the Total Daily Trips minus the Existing Daily Trips. Project net daily trips equal to 16,435 – 7,783 = 8,652 and Alternative 2 net daily trips equal to 17,933 – 7,783 = 10,150.*

levels at off-site sensitive uses. In addition, like the Project, building mechanical equipment installed as part of Alternative 2 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include vibration-attenuation mounts to reduce vibration transmission such that the vibration would not be perceptible at any off-site sensitive receptors. Therefore, as with the Project, operation of Alternative 2 would not increase vibration levels in the immediate vicinity of the Project Site. As such, vibration impacts associated with operation of Alternative 2 would also be less than significant. Such impacts would be less than the less-than-significant impacts of the Project, as all new development under Alternative 2 would be concentrated within the South Lot and no new development would occur on the North Lot.

I. Public Services

(1) Fire Protection

(a) Construction

The overall amount of construction under Alternative 2 would be increased as compared to the Project due to the increase in total floor area. However, the area of construction under Alternative 2 would be reduced as compared to the Project as the North Lot would not be developed as part of Alternative 2. As discussed in Section IV.L.1, Public Services—Fire Protection, of this Draft EIR, construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings, and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. Given the increased level of construction activity required under this alternative, the potential for accidental on-site fires would be increased. As with the Project, in accordance with OSHA safety and health regulations, construction managers and personnel for Alternative 2 would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities. Additionally, in accordance with OSHA provisions, fire suppression equipment (e.g., fire extinguishers) specific to construction activities would be maintained on-site. Additionally, as with the Project, construction of Alternative 2 would comply with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, as with the Project, compliance with applicable regulatory requirements under Alternative 2 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, thereby reducing the potential demand for fire protection services at the Project Site during construction.

Additionally, as with the Project, construction activities associated with Alternative 2 would also add construction vehicles to the street network and could necessitate temporary partial lane closures for installation of required utility and street improvements. However, as

with the Project, travel lanes would be maintained in each direction on all streets around the construction site throughout the construction period for Alternative 2, and emergency access would be maintained. In addition, like the Project, Alternative 2 would include implementation of a Construction Traffic Management Plan as a project design feature to ensure that adequate and safe access remains available within and near the site during construction activities. Also, as with the Project, Alternative 2 would include temporary traffic controls such as flag persons to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of vehicles that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, dedicated turn lanes for construction trucks, rerouting of construction trucks to reduce travel on congested streets, etc.) would also be implemented, as necessary, to ensure emergency access to the construction site and traffic flow on adjacent rights-of-way are maintained. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Overall, construction of Alternative 2, like the Project, would not require a new fire station or the expansion of an existing facility in order to maintain service levels, the construction of which would cause significant environmental impacts. As such, impacts on fire protection during construction of Alternative 2 would similarly be less than significant. Such impacts would be similar to the less-than-significant impacts of the Project due to the overall increase in floor area and resultant increased construction activities along with a reduction in the area of construction.

(b) Operation

Due to the increase in total floor area, Alternative 2 would generate an increased employee population on the Project Site as compared to the Project, which would contribute to an increased demand for LAFD fire protection services. Specifically, Alternative 2 would generate an estimated 4,699 net new employees, which is greater than the Project's approximately 4,139 net new employees (or approximately 4,589 net new employees under the maximum sound stage floor area scenario).[8] Similar to the Project, Alternative 2 would comply with all applicable Los Angeles Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarms, communications systems, and life safety features (e.g., automatic fire sprinkler systems, fire service access elevators, etc.) and would undergo LAFD fire/life safety plan review, which would reduce the demand for fire protection and emergency medical services and also ensure adequate emergency access.

[8] *Refer to the Alternatives Transportation Memorandum included as Appendix R.1 of this Draft EIR.*

Furthermore, as with the Project, vehicle trips generated by Alternative 2 would not significantly impact emergency vehicle response to the Project Site and surrounding area, as the drivers of emergency vehicles have the ability to bypass traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As with the Project, Alternative 2'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.

Additionally, given its density, Alternative 2 would be expected to have the same fire flow requirement as the Project (i.e., 6,000 to 9,000 gpm from four to six hydrants flowing simultaneously), and, thus, as with the Project, following the installation of additional hydrants, LADWP would be able to supply sufficient flow and pressure to satisfy the fire suppression needs of Alternative 2.

Alternative 2 would also generate General Fund tax revenues for the City that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate. Therefore, even with a greater overall demand on LAFD services when compared to the Project, it is assumed that operation of Alternative 2, like the Project, would not result in the need for new or physically altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service ratios, and impacts to fire protection associated with operation of Alternative 2 would be less than significant. However, such impacts under Alternative 2 would be greater than the less-than-significant impacts of the Project due to the increase in floor area and associated service population.

(2) Police Protection

(a) Construction

The overall amount of construction under Alternative 2 would be increased as compared to the Project due to the increase in total floor area. However, the geographic area of construction under Alternative 2 would be reduced as compared to the Project, as the North Lot would not be developed as part of Alternative 2. Similar to the Project, construction of Alternative 2 would not generate a permanent population on the Project Site that would substantially increase the police service population of the North Hollywood Community Police Station because the daytime population generated during construction would be temporary in nature. In addition, the Project Site would continue to be enclosed with fencing, walls, or other barriers to prevent unauthorized access, and access to the Project Site would continue to be controlled by staffed guard houses. Alternative 2 would also implement similar project design features as the Project, which would include additional temporary security measures such as appropriate lighting, locked entry, and security patrols during construction, thereby reducing demand for police protection services. Therefore, as

with the Project, construction of Alternative 2 would not contribute to a temporary increased demand for police protection services.

Furthermore, as previously discussed, while construction activities associated with Alternative 2 would also add construction vehicles to the street network and could necessitate temporary partial lane closures for installation of required utility and street improvements, as with the Project, travel lanes would be maintained in each direction on all streets around the construction site throughout the construction period for Alternative 2, and emergency access would be maintained. In addition, like the Project, Alternative 2 would include implementation of a Construction Traffic Management Plan to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Also, as with the Project, Alternative 2 would include temporary traffic controls such as flag persons to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of vehicles that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, dedicated turn lanes for construction trucks, rerouting of construction trucks to reduce travel on congested streets, etc.) would also be implemented, as necessary, to ensure emergency access to the construction site and traffic flow on adjacent rights-of-way are maintained. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Overall, construction of Alternative 2, like the Project, would not require a new police station or the expansion of an existing facility in order to maintain service levels, the construction of which would cause significant environmental impacts. As such, impacts on police protection during construction of Alternative 2 would similarly be less than significant. Such impacts would be similar to the less-than-significant impacts of the Project.

(b) Operation

As discussed in Section IV.L.2, Public Services—Police Protection, of this Draft EIR, the LAPD considers the residential population within their service area to evaluate service capacity. As Alternative 2 includes additional studio uses and would not include residential uses, this alternative would not introduce a new permanent residential population to the Project Site that could generate a direct demand for police protection services. Therefore, as no residential uses are proposed, Alternative 2 would not increase the LAPD residential service population in the North Hollywood Division.

Due to the increase in total floor area, Alternative 2 would generate an increased visitor and employee population on the Project Site as compared to the Project, which would contribute to an increased demand for police protection services. Specifically, Alternative 2

would generate an estimated 4,699 net new employees, which is greater than the Project's approximately 4,139 net new employees (or approximately 4,589 net new employees under the maximum sound stage floor area scenario).[9]

Alternative 2 would also implement similar security features as the Project to enhance safety within and immediately surrounding the Project Site, which would reduce the demand for police protection services, including a 24/7 security plan, private on-site security staff, and regular security patrols. In addition to these security features, Alternative 2 would also generate General Fund tax revenues for the City that could be used to expand law enforcement resources in the North Hollywood Division, similar to the Project. Therefore, Alternative 2, like the Project, would not result in the need to construct new police protection facilities or modify existing facilities, the construction of which would cause significant environmental impacts, in order to maintain service ratios, and impacts to police protection associated with operation of Alternative 2 would be less than significant. However, such impacts would be greater than the less-than-significant impacts of the Project due to the increase in floor area and associated service population.

m. Transportation

As previously described, Alternative 2 would be developed within a portion (the South Lot) of the Project Site. As such, the plans, policies, and programs applicable to the Project would also apply to Alternative 2. As with the Project, this Alternative would enhance pedestrian access within and around the Project Site, consistent with the Mobility Plan and the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan. Alternative 2 would also prioritize safety and access for all individuals utilizing the Project Site by complying with all ADA requirements as required by the LAMC; include sidewalk and driveway design, vehicular parking, bicycle parking, etc., in accordance with LAMC requirements; and represent urban infill development in close proximity to housing and transit which would encourage alternative transportation use as called for by the Mobility Plan. Furthermore, like the Project, Alternative 2 represents urban infill development within a SCAG-designated Livable Corridor and High Quality Transit Corridor (HQTC) in close proximity to transit and housing, which would encourage alternative transportation use and a reduction in VMT. As with the Project, Alternative 2 would promote pedestrian activity and reduce VMT by providing convenient and adequate bicycling facilities and enhancing the streetscape adjacent to the Project Site through the provision of new landscaping and street trees, lighting, wayfinding signage, and pedestrian/transit amenities. Alternative 2 would also implement a TDM Program to reduce VMT, consistent with the goals of the Mobility Plan, Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan, and the City's TDM Ordinance. Therefore, as with the Project, Alternative 2 would not conflict with any

[9] *Refer to the Alternatives Transportation Memorandum included as Appendix R.1 of this Draft EIR.*

applicable program, plan, ordinance, or policy addressing the circulation system. Impacts would be less than significant and similar to the less-than-significant impacts of the Project.

With respect to VMT, Alternative 2 would result in a higher daily VMT than the Project within the South Valley APC. Specifically, as shown in Appendix R.1 of this Draft EIR, Alternative 2 would generate an average work VMT per employee of 6.3, which would be below the work VMT per employee significance threshold of 11.6 for the South Valley APC, and higher than the Project's average work VMT per employee of 6.2. Therefore, like the Project, Alternative 2 would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b) regarding VMT, and impacts would be less than significant. However, with the increased VMT, such impacts would be greater than the less-than-significant impacts of the Project.

Regarding freeway safety, as required by LADOT's Interim Guidance for Freeway Safety Analysis, if a project is not expected to generate more than 25 or more peak-hour trips at any freeway off-ramps, then a freeway ramp analysis is not required. As discussed in Section IV.M, Transportation, of this Draft EIR, the Project would add 25 or more peak-hour trips to the surrounding off-ramps during the morning and afternoon peak hours.

With the increased floor area under Alternative 2, Alternative 2 would similarly generate more than 25 peak-hour trips, thereby requiring a freeway ramp analysis. As detailed in Table 2 of the Alternatives Transportation Memorandum included as Appendix R.1 of this Draft EIR, with the increased floor area under Alternative 2, Alternative 2 would generate more inbound peak-hour trips than the Project (i.e., 151 more A.M. peak-hour trips and 139 more P.M. peak-hour trips) and as shown in Table 5, would similarly add more than 25 peak-hour trips to the following four freeway off-ramps:

- US 101 Northbound Off-Ramp to Laurel Canyon Boulevard
- US 101 Southbound Off-Ramp to Laurel Canyon Boulevard
- SR 170 Southbound Off-Ramp to Riverside Drive
- SR 134 Westbound Off-Ramp to Lankershim Boulevard

Therefore, further queue analyses were conducted for the anticipated Project buildout year of 2028 and the long-term buildout year of 2045. As detailed in Tables 5 and 6 of the Alternatives Transportation Memorandum, similar to the Project, none of the four analyzed off-ramps would have queues that would both exceed the ramp storage length and include Alternative 2 related vehicles that would add 50 or more feet to any queue during any of the analyzed peak hours compared to Future without Project Condition (Year 2028 and Year

2045). Thus, consistent with the Project, Alternative 2 would neither be subject to speed differential analyses nor cause a significant safety impact, and no mitigation is required.

n. Tribal Cultural Resources

As detailed in Section IV.N, Tribal Cultural Resources, of this Draft EIR, the SLF records search results were negative for tribal cultural resources and the SCCIC records search did not identify any known tribal cultural resources within the Project Site. Additionally, the geoarchaeological investigation conducted as part of the TCR Report indicates that while no artifacts were found, the Project Site may contain historical-period archaeological deposits and prehistoric archaeological deposits. Therefore, the entire Project Site is considered highly sensitive for tribal cultural resources. As discussed in Section IV.N, Tribal Cultural Resources, of this Draft EIR, the Project's impacts on tribal cultural resources were concluded to be less than significant with implementation of mitigation measures.

As previously described, development of Alternative 2 would be located within the South Lot and no new development would occur on the North Lot as compared to the Project, which would include development on both the North Lot and the South Lot. As such, while the maximum excavation depth of approximately 50 feet would be similar to the Project, earthwork activities under Alternative 2 would be reduced compared to the Project and would include approximately 896,000 cubic yards of cut as compared to the approximately 935,000 cubic yards of cut under the Project. Additionally, Alternative 2 would comply with the same applicable regulatory requirements and implement Mitigation Measure TR-MM-1. As such, like the Project, potential impacts to tribal cultural resources under Alternative 2 would be less than significant with mitigation. However, with the reduced construction footprint and reduced area of disturbance and associated reduction in earthwork activities, such impacts would be less than the less-than-significant-with-mitigation impacts of the Project.

o. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities for Alternative 2 would result in a temporary water demand for dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. Despite the increase in floor area and construction activity, construction-related water use would be reduced under Alternative 2 due to the overall reduced amount of grading and excavation activities as a result of the reduced area of construction with development occurring only on the South Lot and no development

occurring on the North Lot. Furthermore, while Alternative 2 would require trenching for connection to the existing water mains in the adjacent streets similar to the Project, Alternative 2 would similarly implement a Construction Traffic Management Plan to ensure the safe and efficient flow of pedestrian and vehicular traffic around the Project Site during construction. In addition, as with the Project, Alternative 2 would construct all water mains and connections in accordance with applicable regulatory requirements to ensure the long-term service of water in the Project Site vicinity. Thus, the construction of these water mains and improvements would not result in significant environmental impacts related to utility infrastructure. Therefore, impacts under Alternative 2 related to water supply and infrastructure during construction would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project. Refer to Section IV.K, Noise, of this Draft EIR regarding the potential construction noise impacts associated with the water infrastructure improvements.

(b) Operation

As with the Project, Alternative 2 would result in an increase in long-term water demand. Based on the increase in total development as compared to the Project, water demand for Alternative 2 would be greater than the Project's water demand. Specifically, as shown in Table V-3 on page V-70, the water demand for Alternative 2 would be an estimated 320,957 gallons per day (360 acre feet [af]), as compared to the Project's water demand of 312,890 gallons per day (351 af) under the proposed development program.

Despite the higher demand, based on the projected water demand estimates for LADWP's service area from the 2020 UWMP (discussed in Section IV.O.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR), Alternative 2 would represent a very small proportion (less than 0.1 percent) of LADWP's projected water demand and supply in 2025 for normal, single-dry, and multiple-dry years (i.e., 0.056 percent, 0.053 percent, and 0.055 percent), similar to the Project.[10,11] Furthermore, as outlined in its 2020 UWMP, LADWP is committed to providing a reliable water supply for the City. The 2020 UWMP takes into account climate change and the concerns of drought and dry weather and notes that the City of Los Angeles will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. The 2020 UWMP also furthers the goals of the Green New Deal, addresses the current and future State Water Project supply shortages, and concludes that MWD's actions in response to the threats to the State Water Project would ensure the continued reliability of its water deliveries.

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[10] *Both the Project and Alternative 2 are compared to LADWP's projected 2025 water demand and supply because this is the closest of the 2020 UWMP's five-year projections to the Project's anticipated buildout year of 2028.*

[11] *[(360 af ÷ 642,600 af) * 100] = ~0.056%; [(360 af ÷ 674,700 af) * 100] = ~0.053%; and [(360 af ÷ 657,900 af) * 100] = ~0.055%.*

Table V-3
Alternative 2 Estimated Water Demand

Land Use	Quantity/ Floor Area	Sewer Generation Rate (gpd/unit)[a]	Demand (gpd)
Existing to Be Removed			
Sound Stage	136,310 sf		
Production Support	166,931 sf		
Production Office	254,851 sf		
General Office	41,893 sf		
Total Existing Water Demand to be Removed[b]			***16,978***
Proposed New Construction			
Sound Stage	226,580 sf	0.05	11,329
Production Support	271,421 sf	0.05	13,571
Production Office	644,791 sf	0.12	77,375
General Office	648,083 sf	0.12	77,770
Retail/Restaurant[c]	1,000 seats	30	30,000
Mobility Hub[d]	27,100 sf	0.05	1,355
Landscaping[e]	109,906 sf		10,789
Covered Parking[f]	1,736,730 sf	0.02	1,142
Cooling Tower[g]	4,750 ton	35.64	169,290
Base Demand Adjustment			1,062
Subtotal Water Demand			*393,683*
Less Required Ordinances Water Savings			*(54,957)*
Less Existing to be Removed			*(16,978)*
Less Additional Conservation			*(791)*
Net Additional Water Demand			***320,957***

gpd = gallons per day

sf = square feet

[a] *The average daily flow based on 100 percent of City of Los Angeles sewerage generation factors.*

[b] *Per the WSA, the existing water usage associated with floor area to be removed as part of the Project was estimated by applying a ratio of the demolished area to the average of the five-year water billing record from October 2018 to September 2023. A percentage of this number was then derived from the difference in uses to be removed as part of the Project versus the uses to be removed as part of Alternative 2. That percentage was then applied to LADWP's estimated water demand from existing uses to be removed to determine the existing water demand associated with the uses to be removed as part of Alternative 2.*

[c] *Conservatively assumes 1 seat per 30 sf, or 1,000 seats per 30,000 sf. Retail/Restaurant is assumed to be 100 percent restaurant for a conservative water demand estimate.*

[d] *Mobility Hub area is not included in the total floor area. Assumes that one Mobility Hub would be provided under Alternative 2 compared to two Mobility Hubs as part of the Project. As such, divided the Project estimated water demand associated with this use by two to determine the water demand from one Mobility Hub as part of Alternative 2.*

Table V-3 (Continued)
Alternative 2 Estimated Water Demand

Land Use	Quantity/ Floor Area	Sewer Generation Rate (gpd/unit)[a]	Demand (gpd)
[e] *Assumes that half of the landscaping area proposed by the Project would be provided as part of Alternative 2 with development of only the South Lot. As such, divided the Project estimated water demand associated with this use by two to determine the water demand from half of the landscaping to be provided as part of Alternative 2.*			
[f] *The WSA assumes cleaning of parking areas twelve times per year with a total daily average of 1,142 gpd. As Alternative 2 would include the same number of parking spaces as the Project, the same parking area of the Project was retained herein.*			
[g] *Assumed the same cooling tower water demand for Alternative 2 as the Project.*			
Source: LADWP, Water Supply Assessment for the Radford Studio Center Project, adopted December 7, 2023, included in Appendix Q of this Draft EIR; Eyestone Environmental, 2025.			

By focusing on demand reduction and alternative sources of water supplies, LADWP will further ensure that long-term dependence on MWD supplies will not be exacerbated by potential future shortages. Additionally, as reaffirmed in the Green New Deal, the City is committed to conserving and recycling water to help meet future water demands in the City. Thus, as with the Project, the estimated water demand under Alternative 2 is expected to be met by LADWP's projected water supplies, including in normal, single-dry, and multi-dry years.

Furthermore, similar to the Project, Alternative 2 would implement all necessary on-site infrastructure and connections to the LADWP water system pursuant to applicable City requirements. Specifically, similar to the Project, Alternative 2 would obtain its domestic water from new laterals (e.g., domestic services) between the proposed on-site buildings and the existing water mains in surrounding streets. In addition, given its density, Alternative 2 would be expected to have the same fire flow requirement as the Project and would incorporate similar water infrastructure improvements as the Project to meet the required fire flow. Therefore, impacts under Alternative 2 related to water supply and infrastructure during operation would be less than significant, and such impacts would be greater than the less-than-significant impacts of the Project due to the increased water demand.

(2) Wastewater

(a) Construction

As discussed in Section IV.O.2, Utilities and Service Systems—Wastewater, of this Draft EIR, similar to the Project, wastewater generation may occur incrementally throughout construction of Alternative 2, and wastewater flows would be greater than the Project's due to the overall increase in development and associated increased number of construction

workers. As with the Project, temporary facilities for construction workers, such as portable toilets and hand wash areas, would be provided by the construction contractor. Sewage generated from these facilities would be collected and hauled off-site and would not be discharged directly into the public sewer system. As such, construction would not contribute directly to the wastewater system that serves the Project Site. While the sewage hauled off-site would eventually be deposited at the Hyperion Water Reclamation Plant (HWRP), the amount generated during construction activities would be a fraction of what is currently generated by the existing uses to be removed. Thus, wastewater generation from construction of Alternative 2 is not anticipated to cause a measurable increase in wastewater flows that would result in the need for new or expanded wastewater treatment facilities.

As with the Project, new sewer line connections would be required to connect the proposed buildings to the main sewer infrastructure system in the streets surrounding the Project Site. Construction impacts associated with new connections would primarily be confined to trenching in order to place the sewer line connections below the surface to connect to the existing off-site public infrastructure, and any off-site work that could potentially affect existing sewer service to adjacent properties would be coordinated with the City of Los Angeles Bureau of Engineering. Alternative 2 would similarly implement a Construction Traffic Management Plan to ensure the safe and efficient flow of pedestrian and vehicular traffic around the Project Site during construction. As such, construction of Alternative 2, as with the Project, would not require or result in the relocation or construction of new or expanded wastewater facilities, the construction or relocation of which could cause significant environmental effects related to utilities. Therefore, similar to the Project, impacts under Alternative 2 related to wastewater during construction would be less than significant. However, such impacts would be greater than the less-than-significant impacts of the Project due to the overall increase in development. Refer to Section IV.K, Noise, of this Draft EIR regarding the potential construction noise impacts associated with wastewater infrastructure improvements.

(b) Operation

As with the Project, operation of Alternative 2 would increase wastewater flows from the Project Site compared to existing conditions. Based on the increase in total floor area, operational wastewater generation under Alternative 2 would be greater than under the Project. Specifically, as shown in Table V-4 on page V-73, wastewater generation for Alternative 2 is estimated to be 509,799 gpd, as compared to the Project's estimated wastewater generation of 486,320 gpd under the proposed development program.

As provided in Section IV.N.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the wastewater generated during Project operation could be accommodated by the existing remaining capacity of the HWRP. The HWRP has a capacity of 450 mgd, and current average wastewater flows are approximately 263.6 mgd. Accordingly, the

Table V-4
Estimated Wastewater Generation

Land Use	Quantity/ Floor Area	Sewer Generation Rate (gpd/unit)[a]	Demand (gpd)
Existing to Be Removed			
Sound Stage	136,310 sf		
Production Support	170,370 sf		
Production Office	297,110 sf		
General Office	42,330 sf		
Total Existing Generation to be Removed[b]			***16,978***
Proposed New Construction			
Sound Stage	226,580 sf	0.05	11,329
Production Support	271,421 sf	0.05	13,571
Production Office	644,791 sf	0.17[c]	109,614
General Office	648,083 sf	0.17[c]	110,174
Retail/Restaurant[d]	1,000 seats	30	30,000
Mobility Hub[e]	27,100 sf	0.05	1,355
Covered Parking[f]	1,736,730 sf	0.02	34,735
Sewer Ejector[g]			216,000
Subtotal Wastewater Generation			*526,778*
Less Existing to be Removed			*(16,978)*
Net Additional Wastewater Generation			**509,799[h]**

sf = square feet

gpd = gallons per day

[a] *The average daily flow based on 100 percent of City of Los Angeles sewerage generation factors.*

[b] *Per the WSA, the existing water usage associated with floor area to be removed as part of the Project was estimated by applying a ratio of the demolished area to the average of the five-year water billing record from October 2018 to September 2023. A percentage of this number was then derived from the difference in uses to be removed as part of the Project versus the uses to be removed as part of Alternative 2. That percentage was then applied to LADWP's estimated water demand from existing uses to be removed to determine the existing water demand associated with the uses to be removed as part of Alternative 2. This same number was conservatively used for the wastewater analysis.*

[c] *LASAN uses a factor of 170 gpd to account for the cooling towers.*

[d] *Conservatively assumes 1 seat per 30 sf, or 1,000 seats per 30,000 sf. Retail/Restaurant is assumed to be 100 percent restaurant for a conservative water demand estimate.*

[e] *Mobility Hub area is not included in the total floor area. Assumes that one Mobility Hub would be provided under Alternative 2 compared to two Mobility Hubs as part of the Project. As such, divided the Project estimated wastewater generation associated with this use by two to determine the wastewater generation from one Mobility Hub as part of Alternative 2.*

[f] *The WSA assumes cleaning of parking areas twelve times per year with a total daily average of 1,142 gpd. The sewer capacity analysis provides a more conservative factor of 0.02 gpd per sf. As Alternative 2 would include the same number of parking spaces as the Project, the same parking area of the Project was retained herein.*

Table V-4 (Continued)
Estimated Wastewater Generation

Land Use	Quantity/ Floor Area	Sewer Generation Rate (gpd/unit)[a]	Demand (gpd)

[g] *Estimated required sewer ejector pump discharge from areas that cannot connect to the City sewer mains by gravity.*

[h] *Numbers may not sum due to rounding.*

Source: LADWP, Water Supply Assessment for the Radford Studio Center Project, adopted December 7, 2023; KPFF, Utility Technical Report for Radford Studio Center Project, January 2025. Refer to Appendices Q and M of this Draft EIR, respectively.

remaining available capacity at the HWRP is approximately 186.4 mgd, which would be sufficient to accommodate Alternative 2's wastewater flows (which would represent approximately 0.3 percent of the current estimated 186.4 mgd of remaining available capacity at the HWRP).

Regarding wastewater conveyance (sewer) capacity, as discussed in Section IV.M.2, Utilities and Service Systems—Wastewater, of this Draft EIR, sewer service for the Project would be provided utilizing new or existing on-site sewer connections to the existing off-site sewer lines in the adjacent streets. Based on the Utility Report provided in Appendix M of this Draft EIR, the Project flows would be well within the 50 percent design capacity of the surrounding sewer lines. As Alternative 2 would result in a limited increase in wastewater flows compared to the Project, it is anticipated that the existing sewer capacity would similarly accommodate Alternative 2. Notwithstanding, as with the Project, additional detailed gauging and evaluation would be conducted for Alternative 2, as required by LAMC Section 64.14, to obtain final approval of a sewer capacity and connection permit during the permitting process. Furthermore, like the Project, all sanitary sewer connections and on-site infrastructure under Alternative 2 would be designed and constructed in accordance with applicable regulatory standards.

Based on the above, operation of Alternative 2, as with the Project, would not be expected to 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. Therefore, impacts under Alternative 2 related to wastewater during operation would be less than significant. However, such impacts would be greater than the less-than-significant impacts of the Project due to the increased wastewater generation under Alternative 2.

(3) Solid Waste

(a) Construction

As with the Project, construction of Alternative 2 would involve demolition and building construction activities. As provided in Table V-5 on page V-76, although the amount of waste associated with new construction would increase compared to the Project, the amount of demolition waste generated by Alternative 2 would be less than the Project, as the North Lot would not be developed, resulting in less overall construction waste disposal. As discussed in Section IV.O.3, Utilities and Service Systems—Solid Waste, of this Draft EIR, pursuant to the requirements of Senate Bill (SB) 1374, a minimum of 75 percent of non-hazardous demolition and construction debris would be recycled and/or salvaged. Applying this rate, Alternative 2 would dispose of approximately 12,510 tons of construction-related waste in the County's permitted inert landfill (i.e., Azusa Land Reclamation) over the construction period compared to 13,329 tons with the Project. Therefore, as with the Project, the amount of construction and debris waste generated by Alternative 2 would similarly represent a miniscule percentage (0.025 percent) of the Azusa Land Reclamation's existing remaining disposal capacity of 50.77 million tons.[12] Thus, similar to the Project, construction of Alternative 2 would not result in the need for an additional disposal facility to adequately handle construction-related waste associated with Alternative 2.

Additionally, as with the Project, Alternative 2's construction and demolition waste would be hauled by a private construction contractor permitted by the City with existing established haul routes. Furthermore, similar to the Project, Alternative 2 would comply with applicable regulatory requirements regarding the disposal of construction-related hazardous waste.

Based on the above, as with the Project, solid waste impacts during construction of Alternative 2 would be less than significant. Such impacts would be less than the less-than-significant impacts of the Project due to the overall reduction in construction-related solid waste.

(b) Operation

During its operation, Alternative 2 would generate municipal solid waste typical of studio and studio-related uses. Similar to the Project, solid waste generated by Alternative 2 would be recycled or collected by private waste haulers contracted by the Applicant and permitted by the City and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles. The transport of solid waste generated by Alternative 2 to waste management/disposal facilities would continue to occur along existing solid waste routes of

[12] *(12,510 tons ÷ 50.77 million tons) x 100 = ~0.0246 = ~0.025 percent.*

Table V-5
Demolition and Construction Waste Generation—Alternative 2

Land Use	Size	Generation Rate (lbs/sf)[a]	Total (tons)
Demolition Waste (Existing Uses to Be Removed)			
Studio/Production and Related Uses	599,985 sf	155	46,499
Total Demolition Waste			*46,499*
Construction Waste (Proposed New Uses)			
Studio/Production and Related Uses	1,820,875 sf	3.89	3,542
Total Construction Waste			*3,542*
Total (prior to diversion)			**50,041**
Total (after 75% diversion)			**12,510**

lbs = pounds

sf = square feet

1 ton = 2,000 pounds

[a] *USEPA, Report No. EPA530-98-010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, Table 3, Table 4, and Table 6. Generation rates used in this analysis are based on an average of various non-residential building types.*

Source: Eyestone Environmental, 2025.

travel. As such, as with the Project, Alternative 2 would not result in the need for additional solid waste collection routes to adequately handle waste generated by operations under Alternative 2.

As with the Project, operation of Alternative 2 would generate additional solid waste requiring disposal in available landfills. Based on the increase in total floor area, solid waste generation under Alternative 2 would be greater than under the Project. Specifically, as provided in Table V-6 on page V-77, when accounting for the existing uses to be removed as part of the Project, Alternative 2 would generate a net increase of approximately 9,252 tons of Class III solid waste annually compared to approximately 7,881 tons generated by the Project (or approximately 8,139 tons under the maximum solid waste generation scenario). When accounting for a diversion rate consistent with the Citywide diversion rate of 76.4 percent, Alternative 2 would generate a net increase of approximately 2,184 tons of Class III solid waste annually compared to the approximately 1,860 tons generated by the Project (or approximately 1,921 tons under the maximum solid waste generation scenario).

As provided in Section IV.O.3, Utilities and Service Systems—Solid Waste, of this Draft EIR, the estimated remaining capacity for the County's Class III landfills currently accepting solid waste is approximately 71.3 million tons as. Thus, Alternative 2's net increase of approximately 2,184 tons of Class III solid waste after diversion would represent

Table V-6
Estimated Operational Solid Waste Generation—Alternative 2[a]

Land Use	Size	Employee Generation Rate per sf[b]	Estimated No. of Employees	Solid Waste Generation Rate[c,d]	Total Generation (tons/year)
Existing Uses					
Sound Stage	359,730 sf	0.0056	2,014 emp	1.09 tn/emp/yr	2,196
Production Support	255,510 sf	0.002	511 emp	2.02 tn/emp/yr	1,032
Production Office	450,060 sf	0.004	1,800 emp	2.02 tn/emp/yr	3,636
General Office	113,810 sf	0.004	455 emp	2.02 tn/emp/yr	920
Total Existing Uses					*7,784*
Total Uses at Buildout					
Sound Stage	450,000 sf	0.0056	2,520 emp	1.09 tn/emp/yr	2,747
Production Support	360,000 sf	0.002	720 emp	2.02 tn/emp/yr	1,454
Production Office	840,000 sf	0.004	3,360 emp	2.02 tn/emp/yr	6,787
General Office	720,000 sf	0.004	2,880 emp	2.02 tn/emp/yr	5,818
Retail/Restaurant[e]	30,000 sf	0.004	120 emp	1.92 tn/emp/yr	230
Total Proposed Uses					*17,036*
Total Net Increase					**9,252**
Total Net Disposal (After 76.4% Diversion)[f]					**2,184**

emp = employee

sf = square feet

tn/emp/yr = tons per employee per year

[a] *Numbers may not precisely add due to rounding.*

[b] *Except for sound stages, employee generation rates are from Los Angeles Department of Transportation and City Planning, City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. Assumes general retail rate for production support and general office rate for production office and general office. For sound stages, rounded rate assumes 100 employees for a typical 18,000-square-foot sound stage as a scalable density; employment rate from Manhattan Beach Studios (MBS), June 2021.*

[d] *Solid waste generation rates are from CalRecycle's Disposal and Diversion Rates for Business Groups, www2.calrecycle.ca.gov/wastecharacterization/businessgrouprates, accessed May 21, 2024. To present a conservative analysis, the Services—Professional Technical, & Financial rate was used for the office use and Retail Trade – Food & Beverage Stores rate was used for the retail use because these categories have the highest generation rates. The Not Elsewhere Classified rate was used for the sound stages because no comparable category is provided.*

[e] *While 30,000 square feet of retail uses are proposed, for purposes of presenting a conservative solid waste analysis it is assumed that all 30,000 square feet of such uses could be comprised of ancillary restaurant/commissary uses.*

[f] *Consistent with the current Citywide diversion rate of 76.4 percent.*

Source: Eyestone Environmental, 2025.

approximately 0.003 percent of the estimated approximately 71.3 million tons of remaining available Class III landfill capacity.[13] As with the Project, Alternative 2's estimated solid waste

[13] *(2,184 tons ÷ 71.3 million tons) × 100 = ~0.003 percent.*

generation would therefore represent a nominal percentage of the remaining daily disposal capacity of those landfills. As such, like the Project, operation of Alternative 2 would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, solid waste impacts during operation of Alternative 2 would be less than significant. However, with the increased floor area and associated increase in solid waste, such impacts would be greater than the less-than-significant impacts- of the Project.

(4) Electric Power, Natural Gas, and Telecommunications Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 2 would consume electricity (construction activities do not typically involve the consumption of natural gas or use of hard-wired telecommunications facilities). The energy consumed during construction of Alternative 2 would be greater than under the Project due to the increase in floor area and associated construction activities. Like the Project, the energy demand associated with construction would be within the energy already generated by the existing uses to be removed. Additionally, as with the Project, Alternative 2 would be required to coordinate energy infrastructure improvements with LADWP and SoCalGas and develop on-site energy infrastructure and connections to the existing off-site energy infrastructure in accordance with- applicable regulatory requirements. Hence, like the Project, construction activities under Alternative 2 would not result in an increase in energy demand that exceeds available distribution infrastructure capabilities that would require the construction of new or expanded energy facilities, the construction of which could cause significant environmental effects. Therefore, impacts on electricity, natural gas, and telecommunications infrastructure associated with short-term construction activities under Alternative 2 would be less than significant and greater than the less-than-significant impacts of the Project due to the increase in construction square footage and activities.

(b) Operation

As with the Project, operation of Alternative 2 would increase the demand for electricity, natural gas, and telecommunications infrastructure relative to existing conditions. Further, operation of Alternative 2 would result in increased demand compared to the Project due to the increase in floor area. Hence, Alternative 2 would result in increased operational consumption on electricity, natural gas, and telecommunications infrastructure when compared to the Project. As discussed in the Utility Report, LADWP and SoCalGas have confirmed that the existing energy infrastructure in the area is sufficient to serve the Project. Additionally, as it relates to natural gas, like the Project, Alternative 2 would comply with the City's all-electric buildings ordinance (Ordinance No. 187,714). Although Alternative 2 would result in increased operational energy demand than the Project, the existing energy

infrastructure in the area is expected to be adequate to serve Alternative 2. Similarly, private telecommunications providers would be expected to expand service capacities as needed to meet demand. Therefore, as with the Project, Alternative 2 operation would not result in an increase in electricity, natural gas, or telecommunications demand that exceeds available distribution infrastructure capabilities that would require the construction of new or expanded facilities, the construction of which could cause significant environmental effects. Impacts on electricity, natural gas, and telecommunications infrastructure under Alternative 2 would be less than significant, but greater than the less-than-significant impacts of the Project.

3. Comparison of Impacts

Based on the analysis provided above, Alternative 2 would not avoid the Project's significant and unavoidable impacts with respect to regional construction-related emissions of NO_X, and such impacts would be similar to those of the Project. Additionally, Alternative 2 would not substantially reduce or avoid the Project's significant and unavoidable cumulative regional construction-related NO_X emissions. With the increase in vehicle trips, Alternative 2 would result in an increase in the extent of the significant and unavoidable impacts associated with Project operation and potential concurrent construction and operational activities. Alternative 2 would also result in a new significant impact associated with VOCs during operation that would not result from the Project.

With regard to construction noise and vibration, Alternative 2 would reduce the Project-level and cumulative impacts associated with on- and off-site noise during construction. However, these impacts would remain significant and unavoidable. Alternative 2 would also result in similar significant and unavoidable impacts associated with on- (Project-level and cumulative) and off-site vibration (Project-level) pursuant to human annoyance.

Alternative 2 would reduce some of the Project's impacts that would be less than significant after mitigation, including those related to biological resources, historical resources, archaeological resources, paleontological resources, and tribal cultural resources.

Alternative 2 would result in greater (but less than significant) impacts associated with the following environmental topics, where the Project's impacts were concluded to be less than significant: aesthetics (scenic vistas and consistency with plans);),; TACs (operation), localized emissions (operation), energy (operation), GHG emissions, hazards and hazardous materials (operation), surface water hydrology (operation), surface water quality (operation), noise (operation), fire protection (operation), police protection (operation), VMT, freeway safety, water supply and infrastructure (operation), wastewater, and solid waste (operation).

Alternative 2 would result in similar impacts associated with the following environmental topics where the Project's impacts were concluded to be less than significant after mitigation: localized emissions (construction) and hazards and hazards materials (construction).

Alternative 2 would result in similar impacts to the Project associated with the following environmental topics where the Project's impacts were concluded to be less than significant: aesthetics (light and glare); groundwater quality; groundwater hydrology (during operation); fire protection (construction); police protection (construction); and transportation (consistency with plans).

Alternative 2 would result in less-than-significant impacts related to TACs (construction); human remains; geologic hazards; surface water quality (construction); groundwater hydrology (construction); surface water hydrology; land use; vibration (associated with building damage) (construction); vibration (operation); water supply (construction); and solid waste (construction) that would be less when compared to the Project's less-than-significant impacts.

4. Relationship of the Alternative to Project Objectives

Alternative 2 would develop the Project Site in accordance with the applicable existing zoning and land use regulations. As discussed above, Alternative 2 would include the development of additional studio-related uses within the South Lot. Alternative 2 would also include Mobility Hubs, additional landscaping, and streetscape improvements. With the development of additional floor area as compared to the Project, Alternative 2 would generally meet the underlying purpose of the Project, which is to maintain Radford Studio Center as a studio and to modernize and enhance production facilities within the Project Site to accommodate both the existing unmet and anticipated future demands of the entertainment industry, keep production activities and jobs in Los Angeles, upgrade utility and technology infrastructure, and create a cohesive studio lot. However, Alternative 2 would be less effective than the Project in meeting this underlying purpose as a result of the increase of floor area to be developed on the South Lot, while no development would occur on the North Lot. To accommodate the increased floor area and required parking facilities within a smaller development area, building heights would be increased up to a maximum 190 feet. Additionally, the non-utilization of the North Lot would hinder efficient and balanced expansion of the studio, while reducing the number of vehicular access points overall.

Regarding the Project objectives, Alternative 2 would meet the following Project objectives generally as effectively as the Project:

- Establish clear guidelines to preserve historic elements of the studio while modernizing and expanding the studio to ensure its continued operational success in the future.

- Grow the local and regional economy by providing a wide range of entertainment and media-related jobs, and keeping production jobs in Los Angeles.

- Enhance the identity of the Project Site as an iconic entertainment and media center by providing an architecturally distinct design and a creative signage program that reflects and complements the production, media, and entertainment uses on-site.

- Create a model of sustainability in modern production studio development and operations by committing to an all-electric development, and integrating best management practices with regard to water, energy, and resource conservation.

Alternative 2 would partially meet the following Project objectives or would not meet the objectives as well as the Project due to the concentration of all new development on the South Lot. Additionally the retention of the Mill Building and associated temporary relocation would reduce the effectiveness and efficiency of the development of studio lot due to the large, dedicated land area for the facility, which would not be able to be used for modern uses arranged in a modern vertical format as the Project proposes:

- Ensure the Project Site retains existing studio uses and provide an expandable and flexible production platform, including sound stages, production support, and office space regulated through the establishment of a Specific Plan to respond to evolving market demands and studio production needs while ensuring compatibility with applicable local and regional plans, specifically the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan

- Create an integrated studio campus that is capable of addressing the evolving demands of the media and entertainment industry, incorporates a mix of compatible land uses, and ensures the Project is compatible with the immediate neighborhood by concentrating building heights away from Project Site edges.

- Optimize the currently underutilized Project Site to accommodate the existing unmet and anticipated future demands of the entertainment industry by providing new, state-of-the-art sound stages, production support facilities, production offices, and general offices, and upgraded on-site elements such as circulation, staging, basecamp, outdoor production and parking areas, while remedying past haphazard building additions and prioritizing efficient production operations.

- Enhance access through the provision of multiple safe, secure, and efficient entry points to the Project Site. Additionally, ensure the Project is consistent with the intent of the Los Angeles River Revitalization Master Plan, provides an enhanced

public right-of-way to promote walkability, strengthens bicycle access, and fosters safety and connectivity in the local community.

- Provide multi-modal transportation solutions, including Project Mobility Hubs with services that are integrated with public transit lines and encourage alternative means of transportation and mobility.

V. Alternatives

C. Alternative 3: Reduced Density Alternative

1. Description of the Alternative

Alternative 3, the Reduced Density Alternative, would involve a 25-percent reduction in the Project's proposed development program, as well as a 50-percent reduction in the below grade parking areas within the South Lot. Alternative 3 would include the construction of 1,117,010 square feet of new development (compared to 1,667,010 square feet under the Project), the demolition of 595,049 square feet of existing studio-related uses (compared to up to 646,120 square feet under the Project), and the retention of 584,061 square feet of existing studio-related uses (compared to 532,990 square feet under the Project), resulting in a net increase of 470,890 square feet of floor area (compared to 1,020,890 square feet under the Project). Upon completion of Alternative 3, the Project Site would include a total of 1,650,000 square feet of development with an FAR of approximately 0.85:1. This development would include 340,000 square feet of sound stage uses, 240,000 square feet of production support uses, 540,000 square feet of production office uses, 515,000 square feet of general office uses, and 15,000 square feet of retail uses.

As shown in Figure V-2 on page V-84, Alternative 3 would involve the same general site plan as the Project but with certain reduced building heights, floor areas, and total number of new buildings. The maximum permitted building height would be 105 feet compared to 135 feet with the Project and the maximum proposed building height would be 90 feet compared to 135 feet with the Project.

With regard to parking, approximately 4,525 parking spaces would be provided within at-grade, above-grade, and subterranean parking areas, with the subterranean parking areas reduced within the South Lot by approximately 50 percent. As with the Project, basecamp and outdoor production areas would be permitted throughout the Project Site; however, the square footage of outdoor basecamps and production areas would be reduced relative to existing conditions. Alternative 3 would also include the Project's Mobility Hubs and the same frontage areas, building stepbacks, general landscape plan, and streetscape improvements as the Project. In addition, similar to the Project, Alternative 3 would: (1) include off-site improvements, consisting of the Radford Bridge, Class IV bikeway, and utility improvements; (2) be designed to meet LEED Gold or equivalent green building standards with rooftop solar panels provided on-site; and (3) require approval of a Specific Plan and Sign District.

LEGEND

- PROJECT PROPERTY LINE
- SOUND STAGES
- PRODUCTION SUPPORT
- PRODUCTION OFFICE
- CREATIVE OFFICE
- RETAIL
- PARKING
- EXISTING BUILDING

LAND USE SUMMARY

- 1,650,000 Total square feet
- 1,065,939 sf of new studio-related uses
- 584,061 sf of existing studio-related uses
- Total of approximately 4,525 parking spaces
- Total 0.85:1 FAR
- Maximum permitted height: 105 feet

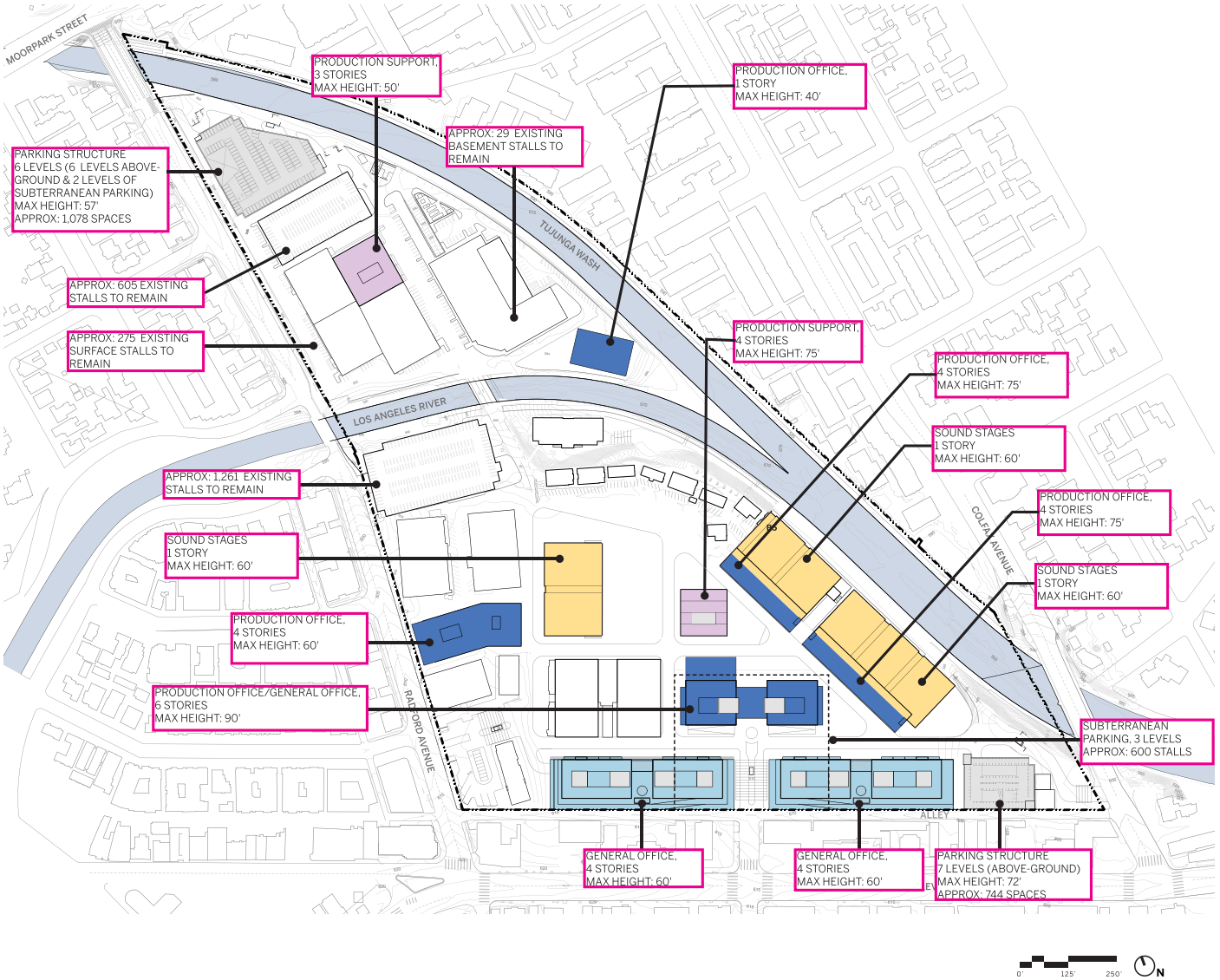

Figure V-2
Alternative 3 Site Plan

Source: Skidmore, Owings & Merrill, 2024.

Since Alternative 3 would involve less floor area and less below-grade construction than the Project, there would be a corresponding reduction in overall construction activity and associated equipment although the peak level of daily activity would be similar to that under the Project. Alternative 3 assumes reduced earthwork quantities compared to the Project, including approximately 605,000 cubic yards of cut, 55,000 cubic yards of fill (with a maximum excavation depth of approximately 50 feet similar to the Project), and up to approximately 550,000 cubic yards of export. In comparison, earthwork activities necessary for construction of the Project would require an estimated 935,000 cubic yards of cut with approximately 55,000 cubic yards of fill used on-site, resulting in approximately 880,000 cubic yards of net export. As with the Project, this analysis assumes that buildout may occur in one phase over a 39-month timeline, with completion in 2028, or that a long-term buildout option could be exercised with completion in 2045.[14]

2. Environmental Impacts

a. Aesthetics

The Project is an employment center project located in a TPA pursuant to PRC Section 21099 as modified by AB 2553. As such, its aesthetic impacts are less than significant as a matter of law. The analysis of aesthetics impacts in Section IV.A of this Draft EIR and in the analysis of the alternatives is therefore provided for informational purposes only.

(1) Scenic Vistas

As indicated in Section IV.A, Aesthetics, of this Draft EIR, the Project Site is visible from several locations to the south of the Project Site within the Santa Monica Mountains, and the degree of visibility is highly dependent on the distance of the viewpoint from the Project Site, as well as intervening topography. As described above, Alternative 3 would include similar uses to the Project at a reduced intensity. These changes would result in reduced building heights within certain areas of the Project Site and the maximum building height would be 90 feet compared to 135 feet under the Project. As with the Project, while Alternative 3 would result in some changes in the visual appearance of the Project Site and would be visible to varying degrees from the scenic viewpoints in the vicinity of the Project Site, Alternative 3 would not substantially reduce or block existing views of scenic resources available from these viewpoints or reduce the field of view of the scenic vistas available from these viewpoints. Rather, Alternative 3 would place buildings and other improvements on a site that is already developed with numerous studio buildings. Therefore, as with the Project, Alternative 3 would not block scenic vistas, and such impacts would be less when compared

[14] *Only those impacts that could vary with a long-term buildout are specifically addressed in the analysis below.*

to the less-than-significant impacts of the Project due to the reduction in overall building square footage and intensity.

(2) Conflict with Applicable Regulations Governing Scenic Quality

As discussed in Section IV.A, Aesthetics, of this Draft EIR, a number of existing City plans and regulations governing scenic quality are applicable to the Project, including the City's General Plan (i.e., the Framework Element, Conservation Elements and the Community Plan), the RIO, the LAMC, and the Citywide Design Guidelines. As demonstrated in the analysis in Section IV.A, Aesthetics, of this Draft EIR, overall, the Project would not conflict with these regulations. Since Alternative 3 would be developed within the same Project Site as the Project, these same plans and applicable goals, objectives, and policies would be applicable to Alternative 3.

As previously described, Alternative 3, the Reduced Density Alternative, would include similar uses to the Project at a reduced intensity. In addition, Alternative 3 would be constructed within the same Project Site. As such, the same local plans applicable to the Project would be applicable to Alternative 3. Overall, with the development of similar uses to the Project and a similar design to that of the Project but with a reduction in proposed development, Alternative 3 would not conflict with the applicable zoning and other regulations governing scenic quality. Therefore, similar to the Project, the impacts of Alternative 3 related to potential conflicts with the applicable zoning and other regulations governing scenic quality would be less than significant.

(3) Light and Glare

(a) Construction

As with the Project, while the majority of construction under Alternative 3 would occur during daylight hours, construction activities could potentially occur in the evening hours and require the use of artificial lighting. As with the Project, to the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of construction in a given area of the Project Site. As with the Project, any glare generated within the Project Site during construction of Alternative 3 would be highly transitory and short-term given the movement of construction equipment and materials within the construction area. In addition, as with the Project, Alternative 3 would include Project Design Features AES-PDF-1 and AES-PDF-2 that would require the erection of a 10-foot-tall, opaque construction fence around construction sites that are visible from the adjacent public streets, Los Angeles River, and Tujunga Wash, as well as require that construction lighting be directed away from residential properties and the public right-of-way. Therefore, as with the Project, construction activities under Alternative 3 would not create a new source of substantial light or glare or adversely affect daytime or nighttime views in the

area. Impacts would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, Alternative 3 would potentially increase light levels within the Project Site and the surrounding area compared to existing conditions through the introduction of new sources of stationary lighting, and signage lighting. However, as with the Project, the proposed lighting sources under Alternative 3 would be similar to other lighting sources in the Project Site vicinity and would not generate artificial light levels that are out of character with the surrounding area.

As with the Project, future stationary lighting for Alternative 3 would be regulated by the lighting requirements of the proposed Specific Plan, which are incorporated as Project Design Features AES-PDF-3 through AES-PDF-19 in Section IV.A, Aesthetics, of this Draft EIR. These project design features would limit the light from stationary lighting at adjacent sensitive use properties by defining performance requirements that limit light trespass onto an adjacent property with a sensitive use. These project design features also define requirements that would ensure all exterior stationary lighting sources would not be visible from adjacent sensitive use properties and would not present a new source of glare. With implementation of the project design features, illumination from stationary exterior lighting and signage would be less than 2 fc and 3 fc, respectively, and, thus, would be less than significant under Alternative 3. The project design features would also ensure that signage does not result in high contrast or glare. In addition, with a reduction in basecamp and outdoor production areas compared with existing conditions, light and glare impacts associated with these continued uses would also be less than significant under Alternative 3. Overall, potential light and glare impacts under Alternative 3 would be less than significant and less when compared to the Project's less-than-significant impacts due to the overall reduction in development.

b. Air Quality

(1) Conflicts with Plans

As discussed further below, like the Project, Alternative 3 would result in potentially significant localized air quality emissions which would conflict with the AQMP. However, as with the Project, these impacts would be mitigated to a less than significant level with the incorporation of Mitigation Measures AIR-MM-1 and AIR-MM-2. These emissions would be further reduced with the inclusion of Mitigation Measures AIR-MM-3 and AIR-MM-4. With respect to operation, as with the Project, Alternative 3 represents infill development located in close proximity to existing transit lines and would utilize existing infrastructure to serve the proposed uses. As such, like the Project, Alternative 3 would advance regional goals to

reduce VMT through infill development near transit that would reduce air pollutant emissions compared to an average regional project. Alternative 3 would similarly result in less than significant localized operational impacts. Impacts would be similar to the Project, which are less than significant with mitigation.

(2) Construction Emissions

(a) Regional and Localized Air Quality Impacts

As with the Project, construction of Alternative 3 has the potential to create air quality impacts through the use of heavy-duty construction equipment and vehicle trips generated by construction workers and haul trucks traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.B, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Under Alternative 3, the overall amount of construction would be reduced in comparison to the Project due to the 25-percent reduction in total floor area and overall export. Specifically, Alternative 3 would result in approximately 605,000 cubic yards of cut (compared to 935,000 cubic yards under the Project) and approximately 55,000 cubic yards of fill (the same as under the Project), resulting in approximately 550,000 cubic yards of net export (compared to 880,000 cubic yards under the Project). However, the intensity of grading and construction activities under Alternative 3 would be similar to the Project on days when maximum construction activities occur. In particular, the daily on-site construction activities would be similar and the off-site truck trips would be somewhat reduced from approximately 448 trucks to approximately 427 trucks. As maximum daily conditions are used for measuring impact significance, regional air emissions and associated air quality impacts on these days would be similar to those of the Project and would be significant and unavoidable, although the duration of such days would be reduced due to the overall reduction in export activities. As with the Project, Alternative 3 would implement the same mitigation measures (Mitigation Measures AIR-MM-1 through AIR-MM-4, set forth in Section IV.B, Air Quality, of this Draft EIR) in order to reduce regional NO_X impacts. However, as with the Project, implementation of mitigation measures would not reduce regional NO_X impacts to a less-than-significant level. Therefore, impacts associated with regional construction emissions under Alternative 3 would remain significant and unavoidable and similar to the Project's significant and unavoidable impacts.

With regard to localized air quality impacts, construction activities under Alternative 3 would be located at similar distances from sensitive receptors as under the Project. Since air emissions and fugitive dust from construction activities would be similar to those of the Project on maximum construction activity days, localized emissions under Alternative 3

would also be similar to those of the Project and would be potentially significant (related to the emissions of PM_{10} and $PM_{2.5}$) although the number of such days would be reduced due to the overall reduction in building footprint and associated construction activities. Therefore, as with the Project, localized impacts under Alternative 3 would be less than significant after mitigation and similar to the less-than-significant-with-mitigation impacts of the Project.

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 3 would generate DPM emissions associated with heavy equipment operations during grading and excavation activities. These activities would represent the greatest potential for TAC emissions. As discussed in Section IV.B, Air Quality, of this Draft EIR, the Project would result in less-than-significant construction impacts with regard to TAC emissions. Overall, construction emissions generated by Alternative 3 would be less than those of the Project since Alternative 3 would develop 25 percent less total floor area and involve less overall construction activity (although the same peak day construction activity and peak day import/export quantities, as previously discussed). Thus, as with the Project, impacts due to construction-related TAC emissions and the corresponding individual cancer risk under Alternative 3 would be less than significant but would be less when compared to the Project's less-than-significant impacts due to the overall reduction in building footprint and associated construction activities.

(3) Operational Emissions

(a) Regional and Localized Air Quality Impacts

Similar to the Project, operational regional air emissions under Alternative 3 would be generated by vehicle trips to the Project Site and the consumption of natural gas. As discussed in the Alternatives Transportation Memorandum provided in Appendix R.1 of this Draft EIR, development of Alternative 3 would result in approximately 13,447 daily vehicle trips compared to approximately 16,435 daily vehicle trips under the Project and a corresponding approximately 18--percent reduction in total daily VMT compared to the Project (approximately 90,211 total daily VMT under Alternative 3 compared to approximately 109,996 total daily VMT under the Project).[15] As vehicular emissions depend on the number of trips and VMT, vehicular sources associated with Alternative 3 would result in a corresponding reduction in air emissions compared to the Project. In addition, because the overall floor area would be reduced by 25 percent when compared to the Project, the demand for electricity and natural gas would be less than under the Project. Therefore, impacts associated with regional operational emissions under Alternative 3 would be less than

[15] *Gibson Transportation Consulting, Inc., Transportation Assessment for the Radford Studio Center Project, Studio City, California, July 2024, revised January 2025. Refer to Appendix O.1 of this Draft EIR.*

significant but would be less when compared to the Project's less-than-significant impacts due to the 25-percent reduction in total floor area under this alternative.

With regard to on-site localized area source and stationary source emissions, as with the Project, Alternative 3 would not introduce any major new sources of air pollution within the Project Site. Therefore, similar to the Project, localized impacts from on-site emission sources under Alternative 3 would also be less than significant. Such impacts would be less when compared to those of the Project due to the 25-percent reduction in total floor area under this alternative.

Localized mobile source operational impacts are determined mainly by peak-hour intersection traffic volumes. As discussed above, Alternative 3 would result in a reduction in daily vehicle trips compared to the Project, which would correspond to a reduction in peak-hour trips. Therefore, localized mobile source air quality impacts associated with Alternative 3 operations would be less than significant but would be less when compared to the Project's less-than-significant impacts due to the reduction in daily vehicle trips and associated emissions.

(b) Toxic Air Contaminants

As discussed in Section IV.B, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include DPM from delivery trucks. As Alternative 3 would include 25 percent less floor area than the Project, the number of delivery trucks would also be reduced in comparison to the Project. Additionally, as with the Project, the types of uses proposed under Alternative 3 are not considered land uses that generate substantial TAC emissions. As with the Project, typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not proposed under Alternative 3. Similar to the Project, Alternative 3 would not release substantial amounts of TACs and would be consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Thus, as with the Project, potential TAC impacts under Alternative 3 would be less than significant but would be less when compared to the Project's less-than-significant impacts due to the 25-percent reduction in total floor area under this alternative.

(4) Concurrent Construction and Operation

In the event of a long-term buildout scenario, as with the Project, portions of the Project Site under Alternative 3 could be completed and occupied while construction of other Project components occurs. The intensity of this interim year air quality impact would remain similar to the Project under Alternative 3 since the intensity of construction activity (i.e., the pace at which construction occurs and the amount of equipment used on a daily basis) and the balance of completed and occupied components would be similar. Therefore, concurrent

construction and operational regional air quality impacts under Alternative 3 would be significant and unavoidable but would be less when compared to the Project's significant and unavoidable impacts (related to the emission of NO_X) since the overall amount of development would be reduced under this alternative.

c. Biological Resources

(1) Special Status Species

As discussed in Section IV.C, Biological Resources, of this Draft EIR, there is no special status vegetation within the Project Site and impacts with regard to special status vegetation would be less than significant.

With regard to special status wildlife, two special status wildlife species, the big free-tailed bat and the western mastiff bat, and one species of local concern, the California towhee, have the potential to forage and/or roost within the Project Site. As discussed in Section IV.C, Biological Resources, of this Draft EIR, although habitat conditions on the Project Site are not ideal due to the level of disturbance in general and minimal availability of open space, there is a moderate likelihood for both bat species to forage and/or roost throughout the Project Site. While temporary loss of habitat is not likely to affect regional populations of these two bat species, construction activities, such as building demolition, tree removal, and demolition of other structures on the Project Site, may result in direct mortality of bats or untimely abandonment of a roost. As such, impacts on these species would be potentially significant.

Due to the abundance of California towhee throughout the region, and the low likelihood for direct mortality due to species mobility, and the extremely minimal loss of suitable habitat, impacts on this species are considered less than significant.

Development under Alternative 3 would involve a 25-percent reduction in the Project's proposed development program within the same general site plan. As such, potential impacts to the special status wildlife species found within the Project Site would be reduced compared to the Project since Alternative 3 would be anticipated to result in the removal of fewer trees. Alternative 3 would incorporate the same mitigation measure as the Project (i.e., Mitigation Measures BIO-MM-1) to reduce Project impacts related to special-status wildlife species. Therefore, Alternative 3 would result in less-than-significant impacts after mitigation with respect to impacts to candidate, sensitive, or special status species. Due to reduced development and grading, such impacts would be less when compared to the Project's less-than-significant impact after mitigation.

(2) Protected Wetlands

As described in Section IV.C, Biological Resources, of this Draft EIR, there are no federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) as defined by Section 404 of the Clean Water Act within or adjacent to the Project Site. Therefore, similar to the Project, no impacts with respect to protected wetlands would occur under Alternative 3.

However, there are two jurisdictional features, which are regulated by the USACE, RWQCB, and CDFW, that pass through the Project Site—the Los Angeles River and Tujunga Wash. Similar to the Project, the Applicant would consult with these agencies and prepare and process the required permits associated with construction of Alternative 3. As such, as with the Project, through compliance with applicable regulatory requirements, Alternative 3 would result in less-than-significant impacts on jurisdictional features, and such impacts would be similar when compared to the Project's less-than-significant impacts.

(3) Wildlife Movement

As with the Project, development under Alternative 3 would not occur within or adjacent to a recognized regional wildlife corridor as none currently existing within or adjacent to the Project Site. As with the Project, development under Alternative 3 would involve clearing portions of the Project Site, including removal of certain buildings, landscaping, and trees, which could potentially be used by nesting birds. However, as with the Project, Alternative 3 would implement Project Design Feature BIO-PDF-2, which would ensure that the Project would not interfere substantially with the movement of any migratory birds that may nest in the trees within and surrounding the Project Site. Overall, Alternative 3 would result in less-than-significant impacts with respect to impacts to wildlife movement, and such impacts would be less when compared to the Project's less-than-significant impacts due to the reduction in overall development.

(4) Conflict with Local Policies Protecting Biological Resources

As discussed in Section IV.C, Biological Resources, of this Draft EIR, a number of existing City policies or ordinances, including the City's General Plan (i.e., the Framework Element, Conservation Element, Open Space Element, and the Community Plan), the City's Tree Protection Ordinance, the City's RIO District Ordinance landscaping requirements, the City's LARRMP, and the County's Landscaping Guidelines, protecting biological resources are applicable to the Project. As with the Project, since Alternative 3 would be developed within the same Project Site as the Project, these same policies and ordinances would be applicable to Alternative 3. As detailed in Section IV.C, Biological Resources, of this Draft EIR, the Project would generally not conflict with the policies applicable to the Project Site, except for the potential to impact protected trees, which could potentially conflict with

the City's Tree Protection Ordinance. However, with implementation of mitigation that addresses the protection of trees during construction, impacts would be reduced to less than significant. As with the Project, Alternative 3 would implement Mitigation Measure BIO-MM-2, which would reduce potential impacts related to conflicts with local policies or ordinances protecting biological resources to less-than-significant levels. Therefore, as with the Project, Alternative 3 would not conflict with local policies or ordinances protecting biological resources (trees), and such impacts would be less than significant. With the reduction in overall development requiring the removal of fewer trees compared to the Project, such impacts would be less when compared to the Project's less-than-significant impacts after mitigation.

d. Cultural Resources

(1) Historical Resources

As detailed in Section IV.D, Cultural Resources, of this Draft EIR, the Project Site includes three potentially historic structures (i.e., the Mill Building, the Administration Building, and Stage 2), as well as the potential Mack Sennett Historic District. As discussed in Section IV.D, Cultural Resources, of this Draft EIR, Project impacts to these historical resources would be less than significant after mitigation.

As with the Project, Alternative 3 would remove five buildings within the boundary of the potential Mack Sennett Historic District, two of which have been identified as contributors. Although the buildings are representative of support functions, characteristic of independent motion picture studios during the Major Studio Era, the buildings are not critical to understanding the historic significance of the Potential Mack Sennett Historic District, and the Historic District would still convey its significance with their removal. Thus, similar to the Project, potential impacts associated with the removal of contributing buildings would be less than significant.

As with the Project, Alternative 3 would involve the relocation and rehabilitation of the Arts/HR Building, a contributor to the potential Mack Sennett Historic District, as well as the Mill Building, which is eligible for listing in the National Register and California Register and for designation as a Los Angeles HCM. In addition, as with the Project, Alternative 3 would rehabilitate the Mack Sennett Building, the Administration Building, and Stage 2. Furthermore, Alternative 3 would implement the same mitigation measures as the Project (see Mitigation Measures CUL-MM-1 through CUL-MM-20, as set forth in Section IV.D, Cultural Resources, of this Draft EIR) in order to reduce potential impacts from the proposed relocation and rehabilitation of historic buildings. Similar to the Project, potential impacts associated with relocation and rehabilitation of these buildings would be reduced to less-than-significant levels after mitigation under Alternative 3.

With respect to new construction, Alternative 3 would involve a 25-percent reduction in the Project's proposed development program within the same general site plan. As with the Project, new development as part of Alternative 3 would not materially impair the significance of any historical resources located on the Project Site. Thus, the potential impact from new construction would be less than significant but would be less when compared to the Project's less-than-significant impact due to a reduction in overall development and maximum building height.

As with the Project, Alternative 3 would include a Sign District. Thus, as with the Project, signs permitted under the Sign District proposed by Alternative 3 would not diminish the integrity of any of the historical resources located on the Project Site, and all of the historical resources located on the Project Site would remain eligible for listing under national, state, and local landmark and historic district programs, as applicable. Thus, similar to the Project, potential impacts to historical resources from the proposed Sign District would be less than significant.

Overall, similar to the Project, potential impacts to historical resources under Alternative 3 would be less than significant after mitigation.

(2) Archaeological Resources

As discussed in Section IV.D, Cultural Resources, of this Draft EIR, the SCCIC records search did not identify any known archaeological resources within the Project Site. However, the geoarchaeological investigation conducted as part of the Archaeological Resources Assessment, included as Appendix F.2 of this Draft EIR, indicates that, while no artifacts were found, the Project Site may contain historical-period and prehistoric archaeological deposits. As such, there is high sensitivity for buried archaeological resources within the Project Site. As discussed in Section IV.D, Cultural Resources, of this Draft EIR, the Project's impacts on archaeological resources were concluded to be less than significant after mitigation (see Mitigation Measures CUL-MM-21 and CUL-MM-22).

As discussed above, earthwork activities under Alternative 3 would include approximately 605,000 cubic yards of cut as compared to the approximately 935,000 cubic yards of cut under the Project. Nonetheless, it is possible that excavation activities associated with Alternative 3 would also involve intact native sediment that may contain archaeological deposits. However, Alternative 3 would also comply with the same applicable regulatory requirements and implement the same mitigation measures as the Project. Accordingly, as with the Project, potential impacts to archaeological resources under Alternative 3 would be less than significant after mitigation. However, with the reduced cut activities, such impacts would be less when compared to those of the Project.

(3) Human Remains

With regard to human remains, no known traditional burial sites have been identified on the Project Site. Section IV.D, Cultural Resources, of this Draft EIR, concludes that through compliance with applicable regulatory requirements, potential impacts to human remains would be less than significant. As Alternative 3 results in reduced cut activities, potential impacts under Alternative 3 would also be less than significant but would be less when compared to the Project's less-than-significant impacts.

e. Energy

(1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

As with the Project, construction activities associated with Alternative 3 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be reduced compared to the Project due to the reduction in the overall amount of construction. Furthermore, as with the Project, construction activities under Alternative 3 would comply with all applicable regulatory requirements relating to energy use. Therefore, as with the Project, short-term energy use during the construction of Alternative 3 would not occur in a wasteful, inefficient or unnecessary manner, and impacts would be less than significant and would be less when compared to the Project's less-than-significant impact.

As with the Project, operation of Alternative 3 would generate an increase in the consumption of electricity and petroleum-based fuels compared to existing conditions. Alternative 3 would result in a net reduction in natural gas consumption due to compliance with the All-Electric Buildings Ordinance. However, Alternative 3 would result in less operational energy demand than the Project due to the 25-percent reduction in floor area. Alternative 3 would also include energy saving features, including solar. LADWP and SoCalGas have confirmed that the electrical and natural gas infrastructure in the Project Site area has adequate capacity to serve the Project; thus, adequate capacity would also be available to serve Alternative 3. In terms of petroleum-based fuel usage, the number of daily trips generated by this alternative would be lower in comparison to the Project due to the reduced floor area; thus, a corresponding reduction in fuel usage would occur. As with the Project, operation of the proposed uses under Alternative 3 would comply with applicable energy efficiency standards, and new buildings would be developed in accordance with the latest energy efficiency standards. Therefore, as with the Project, long-term energy use during operation of Alternative 3 would not occur in a wasteful, inefficient, or unnecessary manner. Impacts would be less than significant and less when compared to the Project's less-than-significant impacts.

(2) Conflict with Plans for Renewable Energy or Energy Efficiency

As discussed above, Alternative 3 would result in less operational energy demand than the Project due to the reduced floor area under this alternative. As with the Project, Alternative 3 would comply with applicable energy efficiency standards, and the development would represent an infill project within an urbanized area that is well-served by public transportation, thus contributing to an energy efficient land use pattern consistent with SCAG's 2024–2050 RTP/SCS growth forecast. Therefore, similar to the Project, Alternative 3 would not conflict with plans or policies regarding renewable energy and energy efficiency, and the alternative would result in less-than-significant impacts.

f. Geology and Soils

(1) Geologic Hazards

The Project Site is located within the seismically active region of Southern California. As discussed in Section IV.F, Geology and Soils, of this Draft EIR, with implementation of applicable regulatory requirements, Project impacts associated with geologic hazards would be less than significant. Under Alternative 3, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, liquefaction, seismically induced settlement, and subsidence, would be similar to those under the Project, particularly since such geologic hazard impacts are a function of a site's underlying geologic conditions rather than the type of land uses or amount of development proposed. As with the Project, Alternative 3 would be subject to all applicable regulations, including the applicable provisions in the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the California Building Code, the City's General Plan Safety Element, and the Los Angeles Building Code. Furthermore, as with the Project, Alternative 3 would be required to demonstrate compliance with the applicable provisions of these safety requirements before permits can be issued for construction. Accordingly, Alternative 3 would comply with all applicable regulatory requirements, including applicable provisions of the Los Angeles Building Code relating to seismic safety, and accepted and proven construction engineering practices would be implemented, including the geotechnical design recommendations set forth in the Geotechnical Investigation included in Appendix H.1 of this Draft EIR and in Project Design Feature GEO-PDF-1. Impacts related to geology and soils under Alternative 3 would be less than significant, and such impacts would be similar to the Project's less-than-significant impacts.

(2) Paleontological Resources

As discussed in Section IV.F, Geology and Soils, of this Draft EIR, a records search at the NHMLA did not identify any known paleontological resources within the Project Site. However, as evaluated in the Paleontological Resources Report included as Appendix H.3 of this Draft EIR, both Pleistocene-age alluvial fan deposits underlying the Project Site and

the nearby Modelo Formation have produced significant fossil specimens and are, therefore, assigned a high paleontological potential. As discussed in Section IV.F, Geology and Soils, of this Draft EIR, with implementation of Mitigation Measure GEO-MM-1, potential Project impacts associated with uncovering of paleontological resources would be reduced to less-than-significant levels.

Alternative 3 would result in similar depths of excavation but reduced earthwork quantities compared to the Project. In particular, Alternative 3 would require approximately 605,000 cubic yards of cut compared to the approximately 935,000 cubic yards of cut under the Project. Alternative 3 would comply with the same applicable regulatory requirements and implement Mitigation Measure GEO-MM-1, set forth in Section IV.F, Geology and Soils, of this Draft EIR. As such, as with the Project, impacts to paleontological resources under Alternative 3 would be less than significant after mitigation, and such impacts would be less when compared to the Project's less-than-significant after mitigation due to the reduction in earthwork.

g. Greenhouse Gas Emissions

(1) Construction

Under Alternative 3, the overall amount of construction would be reduced in comparison to the Project given the 25-percent reduction in total floor area. Additionally, construction of Alternative 3 would require reduced amounts of cut and export when compared with the Project. Under Alternative 3, the mix of construction equipment and emissions factors would be the same as the Project. However, the overall construction equipment usage would be reduced in comparison to the Project. As a result, GHG emissions during the construction of Alternative 3 would be less than significant and less when compared to the Project's less-than-significant impacts.

(2) Operation

As discussed in Section IV.G, Greenhouse Gas Emissions, of this Draft EIR, GHG emissions from a development project are determined in large part by the number of daily trips generated and the energy consumption associated with the proposed land uses. As discussed above, Alternative 3 would include 25 percent less floor area, consume less energy, and generate fewer daily vehicle trips than the Project. Thus, the amount of GHG emissions generated by Alternative 3 would be less than the Project. As with the Project, Alternative 3 would be designed to comply with the Los Angeles Green Building Ordinance and All-Electric Buildings Ordinance, as applicable, and would incorporate the same sustainability features as set forth in Project Design Feature GHG--PDF-1 to reduce GHG emissions. Specifically, as with the Project, Alternative 3 would be designed to meet LEED Gold or equivalent green building standards, and rooftop solar panels would be provided

on-site. Furthermore, as with the Project, Alternative 3 would represent infill development within an urban area that is well-served by public transportation, and, thus, would contribute to an energy efficient land use pattern which would support the goals of the RTP/SCS intended to reduce GHG emissions. Therefore, as with the Project, Alternative 3 would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 3 would be less than significant and less when compared to the Project's less-than-significant impacts.

h. Hazards and Hazardous Materials

(1) Construction

As with the Project, hazardous materials, such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, would be used and, therefore, would require proper handling, management, and, in some cases, disposal. As discussed for the Project in Section IV.H, Hazards and Hazardous Materials, of this Draft EIR, all potentially hazardous materials under Alternative 3 would be used, stored, and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. As such, as with the Project, impacts associated with the use of hazardous materials during construction would be less than significant. Such impacts would be similar to the Project's less-than-significant impacts.

With regard to potential risk of accident or upset conditions, Alternative 3 would involve the same types of construction activities as the Project with the same potential to encounter ACMs, LBP, contaminated soil, and contaminated groundwater. As with the Project, Alternative 3 would comply with all applicable regulatory requirements related to hazards, and Alternative 3 would implement Mitigation Measure HAZ-MM-1 requiring a Soil Management Plan and Health and Safety Plan, and Project Design Feature HAZ-PDF-1, requiring an updated Spill Prevention, Control, and Countermeasure Plan. Thus, similar to the Project, under Alternative 3, potential impacts associated with risk of hazards and emission or handling of hazardous waste within 0.25 miles of a school during construction would be less than significant after mitigation.

With respect to the Project Site's listing on a hazardous materials site, as discussed in Section IV.H, Hazards and Hazardous Materials, of this Draft EIR, the Project Site is recorded on the "HIST CORTESE" list of sites compiled pursuant to Government Code Section 65962.5 in reference to the LUST file closed by the LARWQCB in January of 1997. This case was associated with USTs damaged during the Northridge Earthquake. The five USTs were removed in 1994 under a permit by the LAFD. Impacted soil was removed for off-site disposal, and groundwater monitoring was required by the LARWQCB in May of

1994. Monitoring of soil vapor and groundwater was conducted, and the LARWQCB closed the LUST file in January of 1997. Implementation of Mitigation Measure HAZ-MM-1 would reduce any potential impacts associated with this case to a less-than-significant level. As with the Project, Alternative 3 would implement this mitigation measure. Thus, similar to the Project, potential impacts associated with listing on a hazardous site would be less than significant after mitigation.

Overall, similar to the Project, impacts related to hazards and hazardous materials during construction under Alternative 3 would be less than significant after mitigation.

(2) Operation

As with the Project. operation of Alternative 3 would involve the use of limited quantities of potentially hazardous materials typical of those used in studio campuses, including paints, adhesives, fuels, pesticides for landscaping, cleaning and maintenance supplies, materials for pyrotechnic special effects, and other general products related to studio operations. As with the Project, as discussed in Section IV.H, Hazards and Hazardous Materials, of this Draft EIR, all hazardous materials on the Project Site under Alternative 3 would be handled, used, stored, and disposed of in accordance with all applicable local, state, and federal regulations. As with the Project, Alternative 3 would include design features requiring the preparation or updating of safety and emergency plans. Such safety and emergency plans would include the SPCCP, the Radford Studio Center Emergency Action Plan, and the Radford Studio Center IIPP, including the Radford Studio Center Safety Manual. Overall, potential impacts associated with hazardous materials use and the resultant potential risk of upset during operation of Alternative 3 would be less than significant. Such impacts would be slightly less when compared to the Project's less-than-significant impacts as a result of the reduced floor area.

i. Hydrology and Water Quality

(1) Surface Water Quality

(a) Construction

Alternative 3 would require less building construction compared to the Project due to the 25 percent reduction in density as well as a reduction in grading. However, the at-grade development footprint and conceptual layout would be similar to the Project. Alternative 3 would similarly require a maximum excavation depth of approximately 50 feet as with the Project and, as such, temporary dewatering may be required. Also like the Project, Alternative 3 would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows. In addition, in the event dewatering is required, as with the Project, temporary dewatering pumps and filtration would be used during construction of Alternative 3 in compliance with the NPDES permit. These temporary

systems would comply with all applicable NPDES requirements related to construction and discharges from dewatering operations, as well as the LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties.

With the implementation of SWPPP and site-specific BMPs, Alternative 3 would reduce or eliminate the discharge of potential pollutants into stormwater runoff. In addition, construction of Alternative 3 would be required to comply with City grading permit regulations, which require the preparation and implementation of necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspections to reduce sedimentation and erosion. Furthermore, Alternative 3 would also be subject to Los Angeles County Flood Control District permit requirements, which prohibit construction within the channel during the rainy season (October 15 to April 15) and require that at least 33 percent of the channel be available for flow through with a temporary diversion for the remainder of the year.

Overall, with compliance with NPDES requirements, site-specific BMPs included as part of the SWPPP, and all applicable City and County of Los Angeles regulations, construction of Alternative 3 would not result in discharges that violate any water quality standard or waste discharge requirements or otherwise substantially degrade water quality. Therefore, as with the Project, construction-related impacts to surface water quality under Alternative 3 would be less than significant and such impacts would be less than the less-than-significant impacts of the Project due to the reduced development and grading.

(b) Operation

As is typical of most urban developments, stormwater runoff from a site has the potential to introduce pollutants such as sediment, nutrients, pesticides, metals, pathogens, oil, and grease into the stormwater system. Similar to the Project, Alternative 3 would implement BMPs for managing stormwater runoff in accordance with the City's LID Ordinance requirements. Due to the incorporation of the LID BMPs, operation of Alternative 3 would not result in discharges that would violate any surface water quality standards or waste discharge requirements, nor would Alternative 3 create substantial additional sources of polluted runoff, which could substantially degrade surface water quality. Thus, as with the Project, impacts to surface water quality during operation of Alternative 3 would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project due to the decrease in total floor area.

(2) Groundwater Quality

(a) Construction

Similar to the Project, Alternative 3 could require temporary dewatering during construction. However, the amount of dewatering required could be potentially reduced under Alternative 3 due to the reduction in grading activities associated with reduced subterranean parking. In addition, as with the Project, any dewatering required under Alternative 3 would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit and applicable LARWQCB requirements.

As discussed in Section IV.H, Hazards and Hazardous Materials, of this Draft EIR, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would, therefore, require proper management and, in some cases, disposal. The management of any resultant hazardous wastes that may be encountered could increase the potential for hazardous materials to be released into groundwater if these materials are released while the site soils are exposed. As with the Project, Alternative 3 would comply with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste. With compliance with all applicable regulations, the potential for the construction of Alternative 3 to release contaminants into groundwater that could affect existing contaminants, expand the area of groundwater contamination, or increase the level of contamination would be reduced. In addition, as there are no existing groundwater production wells or public water supply wells within one mile of the Project Site, construction activities would not be anticipated to affect existing wells.

Like the Project, Alternative 3 would have the potential to encounter contaminated soils, which could potentially affect groundwater. However, as with the Project, any contaminated soils found during excavation would be captured within the volume of excavated material and would be removed from the Project Site and remediated at an approved disposal facility in accordance with applicable regulatory requirements. Lastly, as there are no oil wells on the Project Site, construction activities under Alternative 3 also would not disturb existing oil wells which could impact groundwater quality.

Based on the above, overall impacts with respect to groundwater quality during construction under Alternative 3 would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project due to the reduction in grading and overall development.

(b) Operation

As discussed in Section IV.I, Hydrology and Water Quality, of this Draft EIR, in general, operational activities that could affect groundwater quality include spills of

hazardous materials and leaking USTs. As discussed in Section IV.I, Hazards and Hazardous Materials, of this Draft EIR, no USTs are currently operated at the Project Site. Therefore, as with the Project, Alternative 3 would not disturb existing USTs, and Alternative 3 would not introduce any new USTs that would have the potential to expose groundwater to contaminants. In addition, as with the Project, Alternative 3 would incorporate source control measures, including good housekeeping, removal of trash and maintenance of driveways and parking areas, and proper use and storage of pesticides, which would reduce water quality impacts and prevent pollutants from entering the groundwater by percolation within landscaped areas or other permeable surfaces. Overall, as with the Project, impacts with respect to groundwater quality during operation of Alternative 3 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(3) Surface Water Hydrology

(a) Construction

As previously discussed, Alternative 3 would involve reduced overall floor area and grading. Notwithstanding, as with the Project, construction activities would have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Similar to the Project, Alternative 3 would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, Alternative 3 would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows. In addition, Alternative 3 construction activities would be required to comply with all applicable City grading permit regulations, which require the preparation and implementation of necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspections to reduce sedimentation and erosion. Furthermore, Alternative 3 would also be subject to Los Angeles County Flood Control District permit requirements, which prohibit construction within the channel during the rainy season (October 15 to April 15) and require that at least 33 percent of the channel be available for flow through with a temporary diversion for the remainder of the year. Thus, through compliance with all NPDES Construction General Permit requirements, including the preparation of a SWPPP, implementation of BMPs, as well as compliance with applicable City grading permit regulations, Alternative 3 would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, or flooding on- or off-site. Therefore, construction-related impacts to surface water hydrology under Alternative 3 would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project due to the overall reduction in development and grading.

(b) Operation

Alternative 3 would include the development of new buildings, paved areas, and landscaped areas within the Project Site. As with the Project, it is anticipated that Alternative 3 would decrease impervious surfaces on the Project Site compared to existing conditions with the implementation of new landscaped areas and other pervious areas. In addition, with the introduction of new landscaped areas as part of Alternative 3 as well as incorporation of BMPs in accordance with the City's LID requirements, the overall runoff flow volume would decrease compared to existing conditions. Overall, operation of Alternative 3 would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion, siltation, or on-site or off-site flooding would occur. In addition, Alternative 3 would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, operational impacts to surface water hydrology under Alternative 3 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(4) Groundwater Hydrology

(a) Construction

As previously discussed, as with the Project, Alternative 3 could require a temporary dewatering system during construction, which would occur pursuant to, and comply with, all applicable regulatory requirements. Any discharge of groundwater during construction of Alternative 3 would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit and applicable LARWQCB requirements. As discussed in Section IV.I, Hydrology and Water Quality, of this Draft EIR, no water supply wells are located at the Project Site or within one mile of the Project Site that could be impacted by construction. In addition, as with the Project, Alternative 3 would not include the construction of water supply wells. Therefore, impacts on groundwater hydrology during construction of Alternative 3 would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project due to the reduced grading and overall development.

(b) Operation

As with the Project, it is anticipated that Alternative 3 would decrease impervious surfaces on the Project Site compared to existing conditions due to the implementation of new landscaping and other pervious areas. In addition, as with the Project, Alternative 3 would include the installation of BMPs in accordance with the City's LID requirements in order to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site. As discussed in Section IV.I, Hydrology and Water Quality, of this Draft EIR, regardless of the BMPs ultimately installed, a portion of the stormwater would be captured to be infiltrated

into the ground while the excess stormwater would bypass the BMP systems and discharge to the Los Angeles River through an existing or proposed piped connection. This excess stormwater would not have the opportunity to discharge or infiltrate into the ground and would thus not affect groundwater hydrology, including the direction of groundwater flow. Therefore, as with the Project, Alternative 3 would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management, and impacts on groundwater hydrology during operation of Alternative 3 would be less than significant. Such impacts would be similar to the less-than-significant impacts of the Project.

j. Land Use and Planning

As previously described, Alternative 3 would involve the development of the same land uses as the Project, with an overall 25 percent reduction in floor area. Specifically, Alternative 3 would involve a total of 1,650,000 square feet of development with an associated FAR of approximately 0.85:1. Upon completion of Alternative 3, the Project Site would include 340,000 square feet of sound stages, 240,000 square feet of production support uses, 540,000 square feet of production office uses, 515,000 square feet of general office uses, and 15,000 square feet of retail uses. This alternative would include the same entitlements as the Project, including a General Plan Amendment, a Vesting Zone Change and Height District Change, adoption of the Radford Studio Center Specific Plan, establishment of a Sign District, and a Development Agreement.

As discussed in Section IV.J, Land Use and Planning, of this Draft EIR, the Project was determined to be overall consistent with the applicable plans, policies and regulations adopted for the purpose of avoiding or mitigating an environmental effect, and such impacts were concluded to be less than significant. Alternative 3 includes the same types of uses as the Project, a similar site plan, similar building heights (with reductions in certain portions of the Project Site), and similar on- and off-site improvements, including the Radford Bridge, Mobility Hubs and Class IV bikeway. Thus, Alternative 3 would also be generally consistent with the applicable plans, policies and regulations that were adopted to avoid or mitigate an environmental effect, including, but not limited to, the City's General Plan Framework Element, the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan, the LAMC, and SCAG's 2024–2050 RTP/SCS. Therefore, the impacts of Alternative 3 related to potential conflicts with applicable land use plans, policies, or regulations would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

k. Noise

(1) Noise

(a) Construction

The types of construction activities and associated equipment under Alternative 3 would be substantially similar to the Project, although the amount of demolition and new construction activities would be reduced due to the reduction in total floor area and grading activities. As with the Project, construction of Alternative 3 would generate noise from the use of heavy-duty construction equipment, as well as from haul truck and construction worker trips. Under Alternative 3, on- and off-site construction activities and the associated construction noise levels would be similar to- those of the Project on maximum activity days since the daily intensity of construction activities would be similar to the Project. As such, noise levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project, but the number of such days would be reduced due to the overall reduction in building footprint and associated construction activities. Alternative 3 is also expected to involve a somewhat reduced number of truck trips on peak construction days (i.e., approximately 427 trucks versus approximately 448 trucks per day under the Project). Therefore, noise levels associated with off-site trucks would be slightly reduced under Alternative 3, ranging from 0.1 dBA (L_{eq}) lower along Laurel Canyon Boulevard, Ventura Boulevard, and Radford Avenue and 0.2 dBA (L_{eq}) lower along Moorpark Street and Colfax Avenue, as compared to the Project. However, the estimated off-site construction noise level along Radford Avenue would still exceed the significance threshold. Also, like the Project, Alternative 3 would implement Mitigation Measures NOI-MM-1 and NOI-MM-2, set forth in Section IV.K, Noise, of this Draft EIR, which would minimize construction noise. Nonetheless, on-- and off--site construction noise impacts (both project-level and cumulative) would be significant and unavoidable under Alternative 3, and such impacts would be similar to the Project's significant and unavoidable impacts since noise levels on maximum activity days would be similar.

(b) Operation

As discussed in Section IV.K, Noise, of this Draft EIR, sources of operational noise under the Project would include on--site stationary noise sources, including mechanical equipment, outdoor studio production activities (outdoor production and basecamp), parking facilities, loading docks, and trash compactors; and off--site mobile (roadway traffic) noise sources. Alternative 3 would introduce similar noise sources as the Project. However, it is anticipated that with the overall reduction in total floor area under this alternative (from 2,200,000 square feet to 1,650,000 square feet), the noise levels from building mechanical equipment, outdoor studio production activities, and parking facilities would be reduced compared to existing conditions. As with the Project, Alternative 3 would implement Project Design Feature NOI-PDF-1 requiring acoustic screening of mechanical equipment and

Project Design Feature NOI-PDF-2 providing limits on outdoor studio production activities to occur along the perimeter of the Project Site without prior notification of residents within a 500-foot radius of the Project Site. Accordingly, operational on-site noise impacts under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project.

With regard to operational off-site (traffic) noise, Alternative 3 would result in a smaller net increase in daily vehicle trips than the Project (i.e., a net increase of 5,664 daily trips compared to 8,652 with the Project), which would result in a reduction in off-site operational traffic-related noise levels under Alternative 3.[16] Specifically, the estimated off-site traffic noise under Alternative 3 would result in a maximum noise increase of 2.8 dBA (CNEL) along the roadway segment of Radford Avenue (between Moorpark Street and Woodbridge Street), as compared to the noise increase of 3.7 dBA (CNEL) under the Project. Therefore, off-site noise impacts under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

As noted above, the types of construction activities and associated equipment under Alternative 3 would be similar to the Project's, although construction activities would be reduced and the number of peak daily haul trucks would be somewhat reduced. The on- and off-site vibration levels during construction would be similar to those of the Project as construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment. As such, peak vibration levels generated by construction equipment and construction truck trips under Alternative 3 would be similar to those of the Project, although the duration of such impacts would be reduced due to the overall reduction in demolition, building footprint, and associated construction activities. Accordingly, construction activities under Alternative 3 would result in similar significant and unavoidable on- and off-site vibration impacts based on the significance threshold for human annoyance and less-than-significant on- and off-site vibration impacts based on the significance threshold for building damage as the Project.

(b) Operation

As described in Section IV.K, Noise, of this Draft EIR, sources of vibration related to Project operations would include vehicle circulation, delivery trucks, and building mechanical equipment. These same sources of operational vibration would occur under Alternative 3.

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[16] *Net daily trips increase equal to the Total Daily Trips minus the Existing Daily Trips. Project net daily trips equal to 16,435 – 7,783 = 8,652 and Alternative 3 net daily trips equal to 13,447 – 7,783 = 5,664.*

As with the Project, vehicular-induced vibration from Alternative 3, including vehicle circulation within the subterranean parking areas, would not generate perceptible vibration levels at off-site sensitive uses. In addition, as with the Project, building mechanical equipment installed as part of Alternative 3 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include vibration-attenuation mounts to reduce vibration transmission such that the vibration would not be perceptible at any off-site sensitive receptors. Therefore, as with the Project, operation of Alternative 3 would not increase vibration levels in the immediate vicinity of the Project Site. As such, vibration impacts associated with operation of Alternative 3 would also be less than significant. However, such impacts would be less than the less-than-significant impacts of the Project due to the reduction in vehicle trips and floor area under this alternative.

I. Public Services

(1) Fire Protection

(a) Construction

The overall amount of construction under Alternative 3 would be decreased as compared to the Project due to the decrease in total floor area and reduced grading. As discussed in Section IV.L.1, Public Services—Fire Protection, of this Draft EIR, construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings, and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. Given the decreased level of construction activity required under this alternative, the potential for accidental on-site fires would be reduced. As with the Project, in accordance with OSHA safety and health regulations, construction managers and personnel for Alternative 3 would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities. Additionally, in accordance with OSHA provisions, fire suppression equipment (e.g., fire extinguishers) specific to construction activities would be maintained on-site. Additionally, as with the Project, construction of Alternative 3 would comply with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, as with the Project, compliance with applicable regulatory requirements under Alternative 3 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, thereby reducing the potential demand for fire protection services at the Project Site during construction.

Similar to the Project, construction activities associated with Alternative 3 would also add construction vehicles to the street network and could necessitate temporary partial lane

closures for installation of required utility and street improvements. However, as with the Project, travel lanes would be maintained in each direction on all streets around the construction site throughout the construction period for Alternative 3, and emergency access would be maintained. Alternative 3 would include implementation of a Construction Traffic Management Plan as a project design feature to ensure that adequate and safe access remains available within and near the site during construction activities and would include temporary traffic controls such as flag persons to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of vehicles that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, dedicated turn lanes for construction trucks, rerouting of construction trucks to reduce travel on congested streets, etc.) would also be implemented, as necessary, to ensure emergency access to the construction site and traffic flow on adjacent rights-of-way are maintained. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Overall, construction of Alternative 3, like the Project, would not require a new fire station or the expansion of an existing facility in order to maintain service levels, the construction of which would cause significant environmental impacts. As such, impacts on fire protection during construction of Alternative 3 would similarly be less than significant. Such impacts would be less than the less-than-significant impacts of the Project due to the overall decrease in floor area and grading activities and reduced amount of construction.

(b) Operation

Due to the decrease in total floor area, Alternative 3 would generate a reduced employee population on the Project Site as compared to the Project, which would contribute to a decreased demand for LAFD fire protection services. Similar to the Project, Alternative 3 would comply with applicable Los Angeles Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarms, communications systems, and life safety features (e.g., automatic fire sprinkler systems, fire service access elevators, etc.) and would undergo LAFD fire/life safety plan review, which would reduce the demand for fire protection and emergency medical services and also ensure adequate emergency access.

Furthermore, as with the Project, vehicle trips generated by Alternative 3 would not significantly impact emergency vehicle response to the Project Site and surrounding area as the drivers of emergency vehicles have the ability to bypass traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Alternative 3's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire

Code requirements regarding Project Site access, including providing adequate emergency vehicle access.

Additionally, given its density, Alternative 3 would be expected to have the same fire flow requirement as the Project (i.e., 6,000 to 9,000 gpm from four to six hydrants flowing simultaneously), and, thus, as with the Project, following the installation of additional hydrants, LADWP would be able to supply sufficient flow and pressure to satisfy the fire suppression needs of Alternative 3.

Alternative 3 would also generate General Fund tax revenues for the City that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate. Therefore, operation of Alternative 3, like the Project, would not result in the need for new or physically altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service ratios, and impacts to fire protection associated with operation of the Alternative would be less than significant. Impacts under Alternative 3 would be less than the less-than-significant impacts of the Project due to the decrease in floor area and associated service population.

(2) Police Protection

(a) Construction

The overall amount of construction under Alternative 3 would be decreased as compared to the Project due to the decrease in total floor area and grading. Similar to the Project, construction of Alternative 3 would not generate a permanent population on the Project Site that would substantially increase the police service population of the North Hollywood Community Police Station because the daytime population generated during construction would be temporary in nature. In addition, the Project Site would continue to be enclosed with fencing, walls, or other barriers to prevent unauthorized access, and access to the site would continue to be controlled by staffed guard houses. Alternative 3 would also implement similar project design features as the Project, which would include additional temporary security measures such as appropriate lighting, locked entry, and security patrols during construction, thereby reducing demand for police protection services. Therefore, as with the Project, construction of Alternative 3 would not contribute to a temporary increased demand for police protection services.

While construction activities associated with Alternative 3 would also add construction vehicles to the street network and could necessitate temporary partial lane closures for installation of required utility and street improvements, as with the Project, travel lanes would be maintained in each direction on all streets around the construction site throughout the construction period for Alternative 3, and emergency access would be maintained. In addition, like the Project, Alternative 3 would include implementation of a Construction Traffic

Management Plan to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Also, as with the Project, Alternative 3 would include temporary traffic controls such as flag persons to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of vehicles that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, dedicated turn lanes for construction trucks, rerouting of construction trucks to reduce travel on congested streets, etc.) would also be implemented, as necessary, to ensure emergency access to the construction site and traffic flow on adjacent rights-of-way are maintained. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Overall, construction of Alternative 3, like the Project, would not require a new police station or the expansion of an existing facility in order to maintain service levels, the construction of which would cause significant environmental impacts. As such, impacts on police protection during construction of Alternative 3 would similarly be less than significant. Such impacts would be less than the less-than-significant impacts of the Project due to the reduced development, grading activities and overall amount of construction activities.

(b) Operation

As discussed in Section IV.L.2, Public Services—Police Protection, of this Draft EIR, the LAPD considers the residential population within their service area to evaluate service capacity. As the Project includes additional studio uses and would not include residential uses, the Project would not introduce a new permanent residential population to the Project Site that could generate a direct demand for police protection services. Therefore, as no residential uses are proposed, the Project would not increase the LAPD residential service population in the North Hollywood Division.

Due to the decrease in total floor area, Alternative 3 would generate a decreased visitor and employee population on the Project Site as compared to the Project that would contribute to a decreased demand for police protection services. Alternative 3 would also implement similar security features as the Project to enhance safety within and immediately surrounding the Project Site, which would reduce the demand for police protection services, including a 24/7 security plan, private on-site security staff, and regular security patrols. Alternative 3 would also generate General Fund tax revenues for the City that could be used to expand law enforcement resources in the North Hollywood Division, similar to the Project. Therefore, Alternative 3 would not result in a need to construct any new police protection facilities or modify any existing facilities. Accordingly, Alternative 3 would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection

facilities, the construction of which would cause significant environmental impacts. Impacts under Alternative 3 would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project due to the decrease in floor area and visitor and employee population.

Alternative 3 would also generate General Fund tax revenues for the City that could be applied toward the provision of new police station facilities and related staffing, as deemed appropriate. Thus, operation of Alternative 3, like the Project, would not result in the need for new or physically altered government facilities (i.e., police stations), the construction of which would cause significant environmental impacts, in order to maintain service ratios, and impacts to police protection associated with operation of Alternative 3. Impacts under Alternative 3 would be less than the less-than-significant impacts of the Project due to the decrease in floor area and associated visitor and employee population.

m. Transportation

Alternative 3 would be developed within the same Project Site as the Project and with similar uses but with a 25 percent reduction in overall development. As such, the same transportation-related plans, policies, and programs applicable to the Project would also apply to Alternative 3. These include the Mobility Plan, Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan, Plan for a Healthy Los Angeles, the LAMC, the CVC, Vison Zero, RIO, and Citywide Design Guidelines. As with the Project, Alternative 3 would not conflict with these plans, policies and regulations. In particular, Alternative 3 would include the Radford Bridge that would provide pedestrian and bicycle connections within the Project vicinity, the Mobility Hubs, which would promote TDM and reduce VMT, and the Class IV bikeway along Radford Avenue that would promote bicycle access in the Project vicinity. Like the Project, Alternative 3 would also prioritize safety and access for all individuals utilizing the Project Site by complying with all ADA and LAMC requirements related to pedestrian, vehicle and bicycle access. Furthermore, like the Project, Alternative 3 represents urban infill development within a SCAG-designated Livable Corridor and HQTC in close proximity to transit and housing, which would encourage alternative transportation use and a reduction in VMT. As with the Project, Alternative 3 would also promote pedestrian activity and reduce VMT by providing convenient and adequate bicycling facilities; and enhancing the streetscape adjacent to the Project Site through the provision of new landscaping and street trees, lighting, wayfinding signage, and pedestrian/transit amenities such as benches and a protected bikeway. Alternative 3 would also implement a TDM Program to reduce VMT, consistent with the Mobility Plan, Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan, and the City's TDM Ordinance. Therefore, as with the Project, Alternative 3 would not conflict with a program, plan, ordinance, or policy addressing the circulation system. Impacts would be less than significant and similar to the less-than-significant impacts of the Project.

With respect to VMT, Alternative 3 would result in a higher daily VMT than the Project within the South Valley APC. Specifically, as shown in Appendix R.1 of this Draft EIR, Alternative 3 would result in a daily work VMT of 7.0 VMT per employee, which would be below the work VMT per employee significance threshold of 11.6 for the South Valley APC and greater than the Project's work VMT of 6.2. Therefore, like the Project, Alternative 3 would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b) regarding VMT, and impacts would be less than significant and greater than the less-than-significant impacts of the Project.

Regarding freeway safety, as required by LADOT's Interim Guidance for Freeway Safety Analysis, if a project is not expected to generate more than 25 or more peak-hour trips at any freeway off-ramps, then a freeway ramp analysis is not required. As shown in Table 2 of the Alternatives Transportation Memorandum included as Appendix R.1 of this Draft EIR, with the reduced floor area under Alternative 3, Alternative 3 would generate fewer peak-hour trips than the Project (i.e., 401 fewer A.M. peak-hour trips and 403 fewer P.M. peak-hour trips). Therefore, Alternative 3 would add fewer vehicles to the freeway off-ramp queues than the Project. Thus, similar to the Project, Alternative 3 would neither be subject to speed differential analyses nor cause a significant safety impact and impacts would be less than significant and similar to the less than significant Project impacts.

n. Tribal Cultural Resources

As discussed in Section IV.N, Tribal Cultural Resources, of this Draft EIR, the SLF records search results were negative for tribal cultural resources and the SCCIC records search did not identify any known tribal cultural resources within the Project Site. However, the geoarchaeological investigation conducted as part of the TCR Report indicates that while no artifacts were found, the Project Site may contain historical-period archaeological deposits and prehistoric archaeological deposits. Therefore, the entire Project Site is considered highly sensitive for tribal cultural resources. As discussed in Section IV.N, Tribal Cultural Resources, of this Draft EIR, the Project's impacts on tribal cultural resources were concluded to be less than significant with implementation of mitigation measures.

Alternative 3 would result in approximately 605,000 cy of cut activities as compared to the approximately 935,000 cy of cut under the Project. Therefore, like the Project, Alternative 3 has the potential to uncover previously unidentified tribal cultural resources, but to a lesser extent than the Project. Like the Project, Alternative 3 would also implement Mitigation Measure TCR-MM-1 set forth in Section IV.N, Tribal Cultural Resources, of this Draft EIR to mitigate potential impacts to tribal cultural resources. As such, the potential to uncover previously unidentified tribal cultural resources would be less than significant with mitigation, and such impacts would be less than the less-than-significant-with-mitigation impacts of the Project due to the reduction in overall earthwork quantities.

o. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities for Alternative 3 would result in a temporary water demand for dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. Construction-related water use would be reduced under Alternative 3, as this alternative would involve reduced grading activities as compared to the Project. Furthermore, while Alternative 3 would require trenching and other construction activities related to new water mains and connections to existing water mains similar to the Project, Alternative 3 would similarly implement a Construction Traffic Management Plan to ensure the safe and efficient flow of pedestrian and vehicular traffic around the Project Site during construction. As with the Project, Alternative 3 would construct all water mains and connections in accordance with applicable regulatory requirements to ensure the long-term service of water in the Project Site vicinity and adequate fire flow to the Project Site. Thus, the construction of these water mains and improvements would not result in significant environmental impacts related to utility infrastructure. Therefore, impacts under Alternative 3 related to water supply and infrastructure during construction would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project. Refer to Section IV.K, Noise, of this Draft EIR regarding the potential construction noise impacts associated with the water infrastructure improvements.

(b) Operation

As discussed in Section IV.O.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, based on the WSA prepared for the Project, operation of the Project would generate a demand for water that would be accommodated by LADWP's future water supplies and impacts associated with the demand for water would be less than significant. As with the Project, Alternative 3 would result in an increase in long-term water demand. However, based on the reduction in total floor area as compared to the Project, water demand for Alternative 3 would be less than the Project's estimated increase in water demand. In addition, like the Project, Alternative 3 would include water conservation features to reduce the demand for water. Thus, the estimated water demand under Alternative 3 could be met by LADWP's projected water supplies, including in normal, single-dry, and multi-dry years through the year 2045. In addition, Alternative 3 would be expected to have the same fire flow requirement as the Project and would incorporate similar water infrastructure improvements as the Project to meet the required fire flow. Therefore, impacts under Alternative 3 related to water supply and infrastructure during operation would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Limited wastewater generation may occur incrementally throughout construction of Alternative 3. As with the Project, temporary facilities for construction workers, such as portable toilets and hand wash areas, would be provided by the construction contractor. Sewage generated from these facilities would be collected and hauled off-site and would not be discharged directly into the public sewer system. As such, construction would not contribute directly to the wastewater system that serves the Project Site. While the sewage hauled off-site would eventually be deposited at the HWRP, the amount generated during construction activities would be a fraction of what is currently generated by the existing uses to be removed. Thus, wastewater generation from construction of Alternative 3 is not anticipated to cause a measurable increase in wastewater flows that would result in the need for new or expanded wastewater treatment facilities.

As with the Project, new sewer line connections would be required to connect the proposed buildings to the main sewer infrastructure system in the streets surrounding the Project Site. Construction impacts associated with new connections would primarily be confined to trenching for the placement of pipe and connection into the existing main sewer lines, and any off-site work that could potentially affect existing sewer service to adjacent properties would be coordinated with the City of Los Angeles Bureau of Engineering and completed in accordance with applicable regulatory requirements. As with the Project, Alternative 3 would similarly implement a Construction Traffic Management Plan to ensure the safe and efficient flow of pedestrian and vehicular traffic around the Project Site during construction. As such, construction of Alternative 3, like the Project, would not require or result in the relocation or construction of new or expanded wastewater facilities, the construction or relocation of which could cause significant environmental effects related to utilities during the construction period. Therefore, similar to the Project, impacts under Alternative 3 related to wastewater during construction would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project due to the reduction in floor area and associated construction activity. Refer to Section IV.K, Noise, of this Draft EIR regarding the potential construction noise impacts associated with wastewater infrastructure improvements.

(b) Operation

As discussed in Section IV.O.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the Project would result in less-than-significant impacts associated with wastewater treatment capacity and conveyance. As with the Project, operation of Alternative 3 would increase wastewater flows from the Project Site. However, based on the relative reduction in total floor area, operational wastewater generation under Alternative 3 would be less than under the Project. Thus, like the Project, the wastewater generated during

operation of Alternative 3 would be accommodated by the existing remaining capacity of the HWRP.

As concluded in Section IV.O.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the sewer lines serving the Project Site have adequate capacity to serve the Project. Since Alternative 3 would generate less operational wastewater than the Project, the local sewer lines would also have adequate capacity to serve Alternative 3. Also, as with the Project, detailed gauging and evaluation would be conducted for Alternative 3, as required by LAMC Section 64.14, to obtain final approval of a sewer capacity and connection permit during the permitting process. Furthermore, as with the Project, all sanitary sewer connections and on-site infrastructure under Alternative 3 would be designed and constructed in accordance with applicable regulatory standards. Based on the above, impacts under Alternative 3 related to wastewater during operation would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project.

(2) Solid Waste

(a) Construction

As discussed in Section IV.O.3, Utilities and Service Systems—Solid Waste, of this Draft EIR, the Project would result in less-than-significant impacts associated with solid waste during construction. Under Alternative 3, the amount of demolition and construction waste generated by Alternative 3 would be less than the Project due to less demolition and the reduction in total floor area. Therefore, given that the demolition and construction waste would be less than that of the Project, existing landfills would also be capable of accommodating the demolition and construction waste from Alternative 3. Furthermore, similar to the Project, construction of Alternative 3 would not conflict with any applicable local, state, and federal regulations regarding solid waste disposal. As such, solid waste impacts during construction would be less than significant under Alternative 3 and less than the less-than-significant impacts of the Project.

(b) Operation

As discussed in Section IV.O.3, Utilities and Service Systems—Solid Waste, of this Draft EIR, the Project would result in less-than-significant impacts associated with solid waste during operation. During its operation, Alternative 3 would generate municipal solid waste typical of studio and studio-related related uses. Similar to the Project, solid waste generated by Alternative 3 would be recycled or collected by private waste haulers contracted by the Applicant and permitted by the City and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles. The transport of solid waste generated by Alternative 3 to waste management/disposal facilities would continue to occur along existing solid waste routes of travel. As such, as with the Project, Alternative 3 would

not result in the need for additional solid waste collection routes to adequately handle waste generated by operations under Alternative 3.

Alternative 3 would also generate overall less solid waste compared to the Project due to the reduction in the total floor area. Therefore, the existing landfills serving the Project Site would also have adequate capacity to accommodate the disposal needs of Alternative 3. Since the solid waste generated by Alternative 3 would be less than that of the Project, Alternative 3 would not result in the need for an additional recycling or disposal facility to adequately handle waste generated. As such, solid waste impacts during operation of Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(3) Electric Power, Natural Gas, and Telecommunications Infrastructure

(a) Construction

As discussed in Section IV.O.3, Utilities and Service Systems—Electric Power, Natural Gas, and Telecommunications Infrastructure, of this Draft EIR, the Project would result in less-than-significant impacts associated with energy use during construction. Similar to the Project, construction activities associated with Alternative 3 would consume minor quantities of electricity (construction activities do not typically involve the consumption of natural gas or use of hard-wired telecommunications facilities). The energy consumed during construction of Alternative 3 would be less than under the Project due to the 25 percent reduction in floor area and associated construction activities. Furthermore, because the Project Site is an urban infill site that is already served by energy infrastructure, like the Project, it is anticipated that Alternative 3 would not require the construction of off-site energy infrastructure improvements. Lastly, like the Project, Alternative 3 would be required to coordinate energy infrastructure improvements with LADWP and SoCalGas and develop on-site energy infrastructure and connections to the existing off-site energy infrastructure in accordance with applicable regulatory requirements. Overall, like the Project, construction activities under Alternative 3 would not result in an increase in energy demand that exceeds available distribution infrastructure capabilities that would require the construction of new or expanded energy facilities, the construction of which could cause significant environmental effects. Therefore, impacts on electricity, natural gas, and telecommunications infrastructure associated with short-term construction activities under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

(b) Operation

As discussed in Section IV.O.3, Utilities and Service Systems—Electric Power, Natural Gas, and Telecommunications Infrastructure, of this Draft EIR, the Project would result in less-than-significant impacts associated with energy use during operation. As with

the Project, operation of Alternative 3 would increase the demand for electricity, natural gas, and telecommunications infrastructure relative to existing conditions. However, Alternative 3 operations would result in less demand than the Project, due to the reduction in floor area. Additionally, as it relates to natural gas, like the Project, Alternative 3 would comply with the City's all-electric buildings ordinance (Ordinance No. 187,714). Hence, Alternative 3 would result in reduced operational impacts on energy, natural gas and telecommunications infrastructure when compared to the Project. Also, as discussed in Section IV.O.3, Utilities and Service Systems—Electric Power, Natural Gas, and Telecommunications Infrastructure, of this Draft EIR, LADWP and SoCalGas have confirmed that the existing energy infrastructure in the area is sufficient to serve the Project. Because Alternative 3 would result in less operational energy demand than the Project, the existing energy infrastructure in the area would also be adequate to serve Alternative 3. Similarly, private telecommunications providers would be expected to expand service capacities as needed to meet demand. Therefore, as with the Project, Alternative 3 operation would not result in an increase in energy or telecommunications demand that exceeds available distribution infrastructure capabilities that would require the construction of new or expanded facilities, the construction of which could cause significant environmental effects. Impacts on electricity, natural gas, and telecommunications infrastructure under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

3. Comparison of Impacts

Based on the analysis provided above, Alternative 3 would not avoid or substantially lessen the Project-level and cumulative significant and unavoidable impacts with respect to regional construction emissions, regional emissions associated with concurrent construction and operations, on- and off-site noise during construction, and on- -site vibration (based on the significance threshold for human annoyance) during construction. Alternative 3 would also not avoid or substantially lessen the Project-level significant and unavoidable impact with respect to off-site vibration during construction (human annoyance). These impacts would continue to be significant and unavoidable under Alternative 3 although the duration of such impacts would be reduced due to the overall reduction in development and associated construction activities.

Alternative 3 would result in similar impacts associated with the following environmental topics, where the Project's impacts were concluded to be less than significant after mitigation: localized construction-related emissions, historical resources, and hazards and hazardous materials during construction.

Alternative 3 would result in reduced impacts associated with the following environmental topics, where the Project's impacts were concluded to be less than significant after mitigation: biological resources; archaeological resources; paleontological resources; and tribal cultural resources.

Furthermore, Alternative 3 would result in similar less-than-significant impacts as the Project with regard to the following topics: conflicts with renewable energy plans, geologic hazards, surface water quality, groundwater quality (operation), groundwater hydrology (operation), land use and planning, and on- and off-site construction-related vibration based on the significance threshold for building damage.

Alternative 3 would result in less-than-significant impacts associated with VMT that would be greater than the Project's less-than-significant impacts.

Alternative 3 would reduce several of the less-than-significant impacts associated with the Project, including those related to the following: aesthetics; regional and localized emissions (operation); TACs; human remains energy; GHG emissions; hazards and hazardous materials during operation; surface water quality; groundwater quality (construction); groundwater hydrology (construction); surface water hydrology (construction); noise (operation); vibration (operation); fire protection; police protection; conflicts with transportation plans; freeway safety; water supply and infrastructure; wastewater; solid waste; and electricity, natural gas, and telecommunications infrastructure.

4. Relationship of the Alternative to Project Objectives

As previously discussed, Alternative 3 would involve a 25-percent reduction in the Project's proposed floor area and a reduction in grading and export. Alternative 3 would also include the Radford Bridge, Mobility Hubs, similar frontage areas, building stepbacks, general landscape plan, and streetscape improvements as the Project. While the amount of development under this Alternative would be less than under the Project, Alternative 3 would generally meet the underlying purpose of the Project, which is to maintain Radford Studio Center as a studio use and to modernize and enhance production facilities within the Project Site to accommodate both the existing unmet and anticipated future demands of the entertainment industry, keep production activities and jobs in Los Angeles, upgrade utility and technology infrastructure, and create a cohesive studio lot. However, Alternative 3 would be less effective than the Project in meeting this purpose as a result of the reduced amount of development under this alternative, which would reduce on-site synergies and production capacity. Alternative 3, as proposed, would have six fewer sound stages, thereby reducing the opportunities for productions to be conducted on the Project Site. Additionally, Alternative 3 would not fully remedy the ad-hoc nature of existing development, leaving inefficient circulation and development patterns in-place. Finally, with the 25-percent reduction in overall floor area, approximately 2,256 fewer jobs would be provided.

Regarding the Project objectives, Alternative 3 would meet the following Project objectives generally as effectively as the Project:

- Establish clear guidelines to preserve historic elements of the studio while modernizing and expanding the studio to ensure its continued operational success in the future.

- Enhance access through the provision of multiple safe, secure, and efficient entry points to the Project Site. Additionally, ensure the Project is consistent with the intent of the Los Angeles River Revitalization Master Plan, provides an enhanced public right-of-way to promote walkability, strengthens bicycle access, and fosters safety and connectivity in the local community.

- Provide multi-modal transportation solutions, including Project Mobility Hubs with services that are integrated with public transit lines and encourage alternative means of transportation and mobility.

- Enhance the identity of the Project Site as an iconic entertainment and media center by providing an architecturally distinct design and a creative signage program that reflects and complements the production, media, and entertainment uses on-site.

- Create a model of sustainability in modern production studio development and operations by committing to an all-electric development, and integrating best management practices with regard to water, energy, and resource conservation.

Alternative 3 would partially meet the following Project objectives or would not meet the objectives as well as the Project due to the reduced amount of development under this alternative:

- Ensure the Project Site retains existing studio uses and provide an expandable and flexible production platform, including sound stages, production support, and office space regulated through the establishment of a Specific Plan to respond to evolving market demands and studio production needs while ensuring compatibility with applicable local and regional plans, specifically the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan.

- Create an integrated studio campus that is capable of addressing the evolving demands of the media and entertainment industry, incorporates a mix of compatible land uses, and ensures the Project is compatible with the immediate neighborhood by concentrating building heights away from Project Site edges.

- Optimize the currently underutilized Project Site to accommodate the existing unmet and anticipated future demands of the entertainment industry by providing new, state-of-the-art sound stages, production support facilities, production offices, and general offices, and upgraded on-site elements such as circulation, staging, basecamp, outdoor production and parking areas, while remedying past haphazard building additions and prioritizing efficient production operations.

- Grow the local and regional economy by providing a wide range of entertainment and media-related jobs and keeping production jobs in Los Angeles.

V. Alternatives

D. Alternative 4: Reduced Excavation/Grading Alternative

1. Description of the Alternative

Alternative 4, the Reduced Excavation/Grading Alternative, is designed to reduce the Project's construction-related impacts by eliminating subterranean parking within the South Lot and, therefore, minimizing soil excavation and export. However, Alternative 4 would include the same land use program and similar layout as the Project, as shown in Figure V-3 on page V-122, except all new parking within the South Lot would be located in at-grade and above-ground structures. As a result, building heights would increase as parking would be accommodated on the lower floors with other land uses above as a podium-style structure. As with the Project, Alternative 4 would include the construction of 1,667,010 square feet of new development, the demolition of 646,120 square feet of existing studio-related uses, and the retention of 532,990 square feet of existing studio-related uses, resulting in a net increase of 1,020,890 square feet of floor area.

As shown in Figure V 6 on page V-128, the maximum permitted building height would be 175 feet compared to 135 feet with the Project and the maximum proposed building height would be 160 feet compared to 135 feet with the Project. Nevertheless, as with the Project, the maximum permitted and proposed building height would be located within the central portion of the South Lot.

With regard to parking, approximately 6,050 parking spaces would be provided within at-grade, above-ground, and subterranean parking areas with subterranean parking areas eliminated within the South Lot. As with the Project, basecamp and outdoor production areas would be permitted throughout the Project Site; however, the square footage of outdoor basecamps and production areas would be reduced relative to existing conditions. Alternative 4 would also include the Project's Mobility Hubs and the same frontage areas, building stepbacks, general landscape plan, and streetscape improvements as the Project. In addition, similar to the Project, Alternative 4 would: (1) include off-site improvements, consisting of the Radford Bridge, Class IV bikeway, and utility improvements; (2) be designed to meet LEED Gold or equivalent green building standards with rooftop solar panels provided on-site; and (3) require approval of a Specific Plan and Sign District.

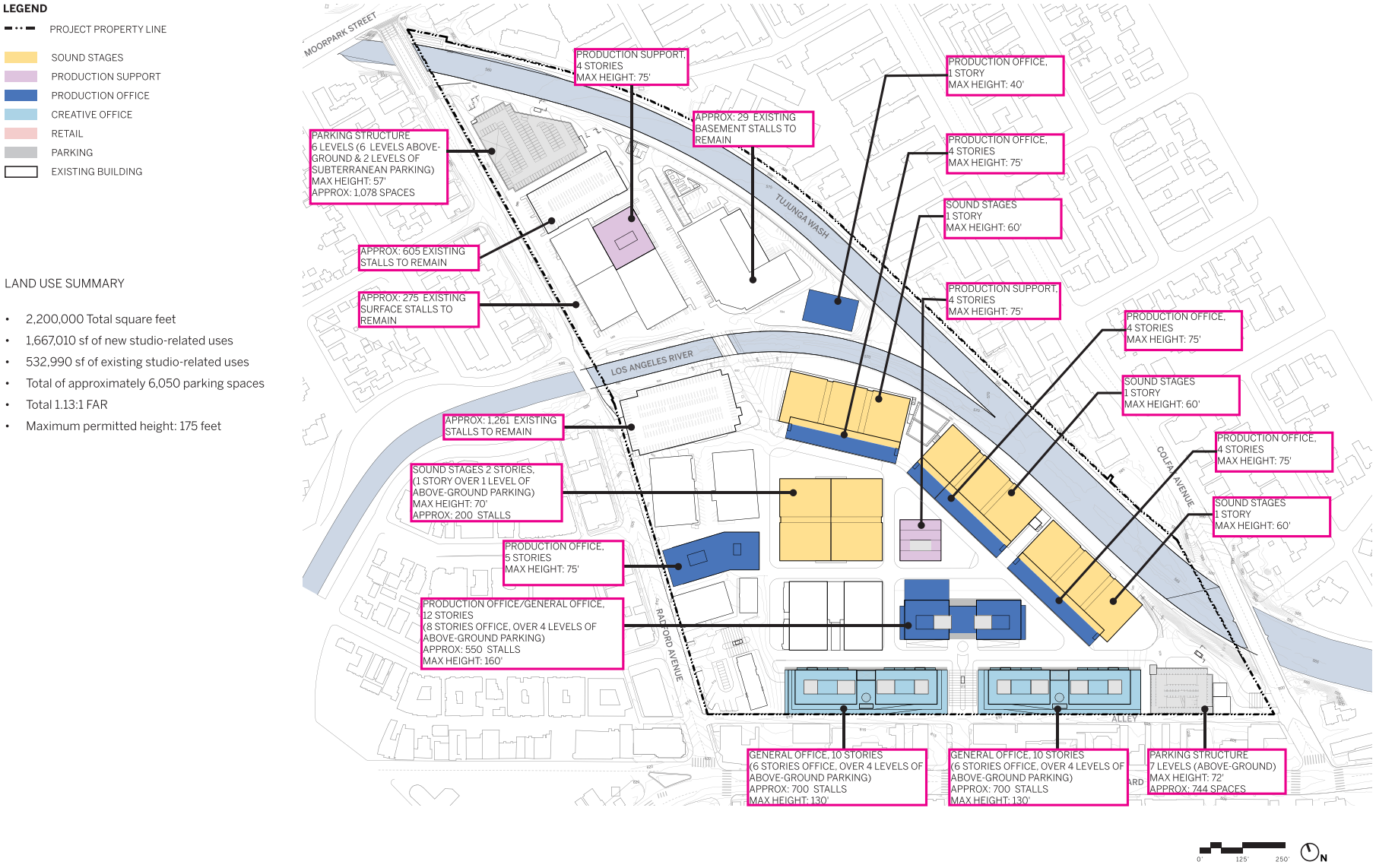

Figure V-3
Alternative 4 Site Plan

Source: Skidmore, Owings & Merrill, 2024.

Under Alternative 4, the overall amount of construction would be similar in comparison to the Project. However, the above-ground parking would result in approximately 68 percent less export of soils when compared with the Project. Although no subterranean parking is proposed within the South Lot, Alternative 4 would require excavation for subterranean parking within the North Lot, building footings, basements, and infrastructure. Excavation activities would include approximately 335,000 cubic yards of cut, and approximately 55,000 cubic yards of fill, resulting in approximately 280,000 cubic yards of export. In comparison, earthwork activities necessary for construction of the Project would require an estimated 935,000 cubic yards of cut with 55,000 cubic yards of fill used on-site, resulting in approximately 880,000 cubic yards of net export. In addition, the depth of excavation under Alternative 4 would extend to a maximum depth of 25 feet, which would be a reduced depth of excavation compared with the Project's maximum depth of 50 feet. This reduced level of earthwork would involve reduced peak day conditions and a shorter construction duration compared to the Project. As with the Project, this analysis assumes that buildout of Alternative 4 may occur in one phase over a 38-month timeline, with completion as early as 2028, or that a long-term buildout option could be exercised with completion in 2045.[17]

2. Environmental Impacts

a. Aesthetics

The Project is an employment center project located in a TPA pursuant to PRC Section 21099 as modified by AB 2553. As such, its aesthetic impacts are less than significant as a matter of law. The analysis of aesthetics impacts in Section IV.A of this Draft EIR and in the analysis of the alternatives is, therefore, provided for informational purposes only.

(1) Scenic Vistas

As described in Section IV.A, Aesthetics, of this Draft EIR, the Project Site is visible from several locations to the south of the Project Site within the Santa Monica Mountains, and the degree of visibility is highly dependent on the distance of the viewpoint from the Project Site, as well as intervening topography. As described above, Alternative 4 would include the same uses and layout as the Project, except all new parking within the South Lot would be located in at-grade or above-ground structures. As a result, Alternative 4 would result in increased building heights within certain areas of the Project Site. Specifically, the maximum building height would be 160 feet compared to 135 feet with the Project. As with the Project, while Alternative 4 would result in some changes in the visual appearance of the Project Site that would be visible to varying degrees from the scenic viewpoints in the vicinity

[17] *Only those impacts that could vary with a long-term buildout are specifically addressed in the analysis below.*

of the Project Site, and while building heights would be increased, Alternative 4 would not substantially reduce or block existing views of scenic vistas available from these viewpoints or reduce the field of view of the scenic vistas available from these viewpoints. Therefore, as with the Project, Alternative 4 would not have a substantial adverse effects on scenic vistas. As such, impacts to scenic vistas would be less than significant. However, given the increase in building heights, such impacts would be greater than the less-than-significant impacts of the Project.

(2) Conflict with Applicable Regulations Governing Scenic Quality

As discussed in Section IV.A, Aesthetics, of this Draft EIR, a number of existing City plans and regulations governing scenic quality are applicable to the Project Site, including the City's General Plan (i.e., the Framework Element, Conservation Elements and the Community Plan), the RIO, the LAMC, and the Citywide Design Guidelines. As demonstrated in the analysis in Section IV.A, Aesthetics, of this Draft EIR, overall, the Project would not conflict with these regulations. Since Alternative 4 would be developed within the same Project Site as the Project, these same plans and applicable goals, objectives, and policies would be applicable to Alternative 4.

As described above, Alternative 4 would include the same development program square footages, and layout as the Project, except all new parking within the South Lot would be located in at-grade or above-ground structures. As a result, Alternative 4 would result in increased building heights. As with the Project, Alternative 4 would construct uses that are consistent with the existing studio uses on the Project Site. Additionally, Alternative 4 would provide height subareas, setbacks, and stepbacks from the existing adjacent development to concentrate building height and massing toward the center of the Project Site, away from Project Site edges. As with the Project, Alternative 4 would be designed consistent with applicable plans related to scenic quality, including promoting pedestrian activity and further activating the streets in the vicinity of the Project Site. Similar to the Project, the proposed uses under Alternative 4 would be designed to be compatible with the general characteristics of the surrounding neighborhood. Overall, as with the Project, Alternative 4 would generally not be in conflict with the zoning and other regulations governing scenic quality detailed in Section IV.A, Aesthetics, of this Draft EIR. Therefore, similar to the Project, the impacts of Alternative 4 related to potential conflicts with the zoning and other regulations governing scenic quality would be less than significant.

(3) Light and Glare

(a) Construction

As with the Project, while the majority of construction under Alternative 4 would occur during daylight hours, construction activities could potentially occur in the evening hours and require the use of artificial lighting. As with the Project, to the extent Alternative 4 requires

evening construction and includes artificial light sources, such use would be temporary and would cease upon completion of construction in a given area of the Project Site. As with the Project, any glare generated within the Project Site during construction of Alternative 4 would be highly transitory and short-term given the movement of construction equipment and materials within the construction area. In addition, as with the Project, Alternative 4 would include Project Design Features AES-PDF-1 and AES-PDF-2 that would require the erection of a 10-foot-tall, opaque construction fence around construction sites that are visible from the adjacent public streets, Los Angeles River, and Tujunga Wash, as well as require that construction lighting be directed away from residential properties and the public right-of-way. Therefore, as with the Project, construction activities under Alternative 4 would not create a new source of substantial light or glare or adversely affect daytime or nighttime views in the area. Impacts would be less than significant, but greater than the less-than-significant impacts of the Project because taller buildings would be constructed.

(b) Operation

As with the Project, Alternative 4 would potentially increase light levels within the Project Site and the surrounding area compared to existing conditions through the introduction of new sources of stationary lighting, signage, and landscape lighting. However, the proposed lighting sources under Alternative 4 would be similar to other lighting sources in the Project Site vicinity and would not generate artificial light levels that are out of character with the surrounding area.

As with the Project, future stationary lighting for Alternative 4 would be regulated by the lighting requirements of the proposed Specific Plan, which are incorporated as Project Design Features AES-PDF-3 through AES-PDF-19 in Section IV.A, Aesthetics, of this Draft EIR. These project design features would limit the light from stationary lighting at adjacent sensitive use properties by defining performance requirements that limit light trespass onto an adjacent property with a sensitive use. These project design features also define requirements that would ensure all exterior stationary lighting sources would not be visible from adjacent sensitive use properties and would not present a new source of glare. With implementation of the project design features, illumination from stationary exterior lighting and signage would be less than 2 and 3 fc, respectively, and, thus, would be less than significant under Alternative 4. The project design features would also ensure that signage does not result in high contrast or glare. In addition, as with the Project, with a reduction in basecamp and outdoor production areas compared with existing conditions, light and glare impacts associated with these continued uses would also be less than significant under Alternative 4. Overall, potential light and glare impacts under Alternative 4 would be less than significant but would be greater than the Project's less-than-significant impacts due to the increase in building heights.

b. Air Quality

(1) Conflicts with Plans

As discussed further below, like the Project, Alternative 4 would result in potentially significant localized air quality emissions which would conflict with the AQMP. However, as with the Project, these impacts would be mitigated to a less than significant level with the incorporation of Mitigation Measures AIR-MM-1 and AIR-MM-2. These emissions would be further reduced with the inclusion of Mitigation Measures AIR-MM-3 and AIR-MM-4. With respect to operation, as with the Project, Alternative 4 represents infill development located in close proximity to existing transit lines and would utilize existing infrastructure to serve the proposed uses. As such, like the Project, Alternative 4 would advance regional goals to reduce VMT through infill development near transit that would reduce air pollutant emissions compared to an average regional project. Alternative 4 would similarly result in less than significant localized operational impacts. Impacts would be similar to the Project, which are less than significant with mitigation.

(2) Construction Emissions

(a) Regional and Localized Air Quality Impacts

As with the Project, construction of Alternative 4 has the potential to create air quality impacts through the use of heavy-duty construction equipment and vehicle trips generated by construction workers and haul trucks traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.B, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Under Alternative 4, the overall amount of construction would be similar in comparison to the Project. However, the above-ground parking structures would result in a reduction of export and haul truck activities on a given day. Specifically, Alternative 4 would result in approximately 335,000 cubic yards of cut (compared to 935,000 cubic yards under the Project) and approximately 55,000 cubic yards of fill (the same as under the Project), resulting in approximately 280,000 cubic yards of net export (compared to 880,000 cubic yards under the Project). As a result, the intensity and duration of air emissions and fugitive dust from grading and export activities would be reduced in comparison to the Project, including on days when maximum construction activities occur. Under Alternative 4, as with the Project, construction activities would be occurring throughout the Project Site with overlapping construction activities where multiple phases (demolition, grading, building construction, finishes) could be occurring on the same day. Although the export of soil would be reduced, the overlapping construction activities under Alternative 4 would result in construction regional NOx emissions that would exceed the corresponding SCAQMD

significance threshold. As with the Project, Alternative 4 would implement the same mitigation measures (see Mitigation Measures AIR-MM-1 through AIR-MM-4, set forth in Section IV.B, Air Quality, of this Draft EIR) in order to- reduce regional NO_X impacts. However, as with the Project, implementation of mitigation measures would not reduce NO_X impacts to a less-than-significant level. Therefore, impacts associated with regional construction emissions under Alternative 4 would remain significant and unavoidable but would be less when compared to the Project's significant and unavoidable impacts.

With regard to localized air quality impacts, construction activities under Alternative 4 would be located at similar distances from sensitive receptors as under the Project. Since air emissions and fugitive dust from these construction activities would be less than those of the Project on maximum construction activity days, localized emissions under Alternative 4 would also be less than those of the Project and would occur for a shorter duration. Therefore, localized impacts under Alternative 4 would be less than significant after mitigation and less than the less-than-significant impacts after mitigation.

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 4 would generate DPM emissions associated with heavy equipment operations during grading and excavation activities. These activities would represent the greatest potential for TAC emissions. As discussed in Section IV.B, Air Quality, of this Draft EIR, the Project would result in less-than-significant construction impacts with regard to TAC emissions. As previously described above, Alternative 4 would involve substantially less earthwork and associated export of soil than the Project, resulting in less construction emissions generated by Alternative 4 than those of the Project. Thus, as with the Project, impacts related to TAC emissions and the corresponding individual cancer risk under Alternative 4 would be less than significant but would be less when compared to the Project's less-than-significant impacts due to the substantial reduction in excavation activities.

(3) Operational Emissions

(a) Regional and Localized Air Quality Impacts

Similar to the Project, operational regional air emissions under Alternative 4 would be generated by vehicle trips to the Project Site and the consumption of natural gas. As discussed in the Alternatives Transportation Memorandum provided in Appendix R.1 of this Draft EIR, development of Alternative 4 would result in the same number of daily vehicle trips and VMT as the Project (an estimated 16,435 daily vehicle trips and an estimated 109,996 total daily VMT).[18] As vehicular emissions depend on the number of trips and VMT,

[18] *See Appendix R.1 of this Draft EIR for VMT Calculator Outputs for Alternatives.*

vehicular sources associated with Alternative 4 would result in no change in air emissions compared to the Project. In addition, because the overall square footage would be unchanged when compared to the Project, the demand for electricity and natural gas would be the same as the Project. Therefore, similar to the Project, impacts associated with regional operational emissions under Alternative 4 would be less than significant.

With regard to on-site localized area source and stationary source emissions, as with the Project, Alternative 4 would not introduce any major new sources of air pollution within the Project Site. Therefore, similar to the Project, localized impacts from on-site stationary emission sources associated with Alternative 4 would also be less than significant. Such impacts would be the same as those of the Project due to the same land uses and overall square footage developed-. Localized mobile source operational impacts are determined mainly by peak-hour intersection traffic volumes. As discussed above, Alternative 4 would result in the same number of daily vehicle trips as the Project, along with the same trip characteristics associated with the same land uses, which would correspond to the same number of peak-hour trips. Therefore, similar to the Project, localized mobile source air quality impacts associated with Alternative 4 operations would be less than significant.

(b) Toxic Air Contaminants

As discussed in Section IV.B, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include DPM from delivery trucks. As this alternative would involve the same proposed development program, the number of delivery trucks would also be the same as under the Project. Additionally, as with the Project, the types of uses proposed under Alternative 4 are not considered land uses that generate substantial TAC emissions. As with the Project, typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not proposed under Alternative 4. Similar to the Project, Alternative 4 would not release substantial amounts of TACs and would be consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Thus, similar to the Project, potential TAC impacts under Alternative 4 would be less than significant.

(4) Concurrent Construction and Operation

In the event of a long-term buildout scenario, as with the Project, portions of the Project Site under Alternative 4 could be completed and occupied while construction of other Project components occurs. The intensity of this interim year air quality impact under Alternative 4 would be reduced in comparison to the Project since the intensity of construction activity would be reduced, primarily due to the reduction in the import/export of soils. However, concurrent construction and operational NO_X emissions under Alternative 4 would also exceed SCAQMD regional significance thresholds for operations, resulting in a significant and unavoidable impact. Although the export of soil would be reduced, the

concurrent construction and operational emissions under Alternative 4 would exceed SCAQMD significance thresholds. As with the Project, Alternative 4 would implement similar mitigation measures (see Mitigation Measures AIR-MM-1 through AIR-MM-4, set forth in Section IV.B, Air Quality, of this Draft EIR) in order to reduce regional NO_X impacts. However, as with the Project, implementation of mitigation measures would not reduce NO_X impacts to a less-than-significant level. As with the Project, concurrent construction and operational regional air quality impacts associated with NO_X emissions under Alternative 4 would remain significant and unavoidable but would be less when compared to the Project's significant and unavoidable impacts due to a reduction in grading activities.

c. Biological Resources

(1) Special Status Species

As discussed in Section IV.C, Biological Resources, of this Draft EIR, there is no special status vegetation within the Project Site and impacts with regard to special status vegetation would be less than significant.

With regard to special status wildlife, two special status wildlife species, the big free-tailed bat and the western mastiff bat, and one species of local concern, the California towhee, have the potential to forage and/or roost within the Project Site. As discussed in Section IV.C, Biological Resources, of this Draft EIR, although habitat conditions on the Project Site are not ideal due to the level of disturbance in general and minimal availability of open space, there is a moderate likelihood for both bat species to forage and/or roost throughout the Project Site. While temporary loss of habitat is not likely to affect regional populations of these two bat species, construction activities, such as building demolition, tree removal, and demolition of other structures on the Project Site, may result in direct mortality of bats or untimely abandonment of a roost. As such, impacts on these species would be potentially significant.

Due to the abundance of California towhee throughout the region, and the low likelihood for direct mortality due to species mobility, and the extremely minimal loss of suitable habitat, impacts on this species would be less than significant.

As previously discussed, Alternative 4 would include the same development program, floor area, and general layout as the Project, except all new parking within the South Lot would be located in at-grade or above-ground structures. As such, potential impacts to special status wildlife species found within the Project Site would be similar to the Project since Alternative 4 would result in the removal of the same trees and buildings. Alternative 4 would implement the same mitigation measure as the Project (i.e., Mitigation Measure BIO-MM-1) to reduce impacts related to special-status wildlife species. Therefore, as with the Project, Alternative 4 would result in less-than-significant impacts after mitigation with

respect to impacts to candidate, sensitive, or special status species, and such impacts would be similar when compared to the Project's less-than-significant impacts after mitigation.

(2) Protected Wetlands

As discussed in Section IV.C, Biological Resources, of this Draft EIR, there are no federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) as defined by Section 404 of the Clean Water Act within or adjacent to the Project Site. Therefore, similar to the Project, no impacts with respect to protected wetlands would occur under Alternative 4.

However, there are two jurisdictional features, which are regulated by the USACE, RWQCB, and CDFW, that pass through the Project Site—the Los Angeles River and Tujunga Wash. Similar to the Project, the Applicant would consult with these agencies and prepare and process the required permits associated with construction of Alternative 4. As such, as with the Project, through compliance with applicable regulatory requirements, Alternative 4 would result in less-than-significant impacts on jurisdictional features, and such impacts would be similar when compared to the Project's less-than-significant impacts.

(3) Wildlife Movement

As with the Project, development under Alternative 4 would not occur within or adjacent to a recognized regional wildlife corridor, as none currently exist within or adjacent to the Project Site. As with the Project, development under Alternative 4, would involve clearing portions of the Project Site, including removal of certain buildings, landscaping, and trees, which could potentially be used by nesting birds. However, as with the Project, Alternative 4 would implement Project Design Feature BIO-PDF-2, which would ensure that construction of Alternative 4 would not interfere substantially with the movement of any migratory birds that may nest in the trees within and surrounding the Project Site. Overall, Alternative 4 would result in less-than-significant impacts with respect to wildlife movement, and such impacts would be similar when compared to the Project's less-than-significant impacts.

(4) Conflict with Local Policies Protecting Biological Resources

As discussed in Section IV.C, Biological Resources, of this Draft EIR, a number of existing City policies or ordinances, including the City's General Plan (i.e., the Framework Element, Conservation Element, Open Space Element, and the Community Plan), the City of Los Angeles Tree Protection Ordinance, the City's RIO District Ordinance landscaping requirements, the City's LARRMP, and the County's Landscaping Guidelines, protecting biological resources are applicable to the Project Site. As with the Project, since Alternative 4 would be developed within the same Project Site, these same policies and ordinances

would be applicable to Alternative 4. As detailed in Section IV.C, Biological Resources, of this Draft EIR, the Project would generally not conflict with the policies applicable to the Project Site, except for the potential to impact protected trees, which could potentially conflict with the City's Tree Protection Ordinance. However, with implementation of mitigation that addresses the protection of trees during construction, impacts would be reduced to less than significant. As with the Project, Alternative 4 would implement Mitigation Measure BIO-MM-2 as set forth in Section IV.C, Biological Resources, of this Draft EIR, which would reduce potential impacts related to conflicts with local policies or ordinances protecting biological resources to less-than-significant levels. Therefore, as with the Project, Alternative 4 would not conflict with applicable local policies or ordinances protecting biological resources (trees), and such impacts would be less than significant after mitigation and similar to the Project's less-than-significant impact after mitigation.

d. Cultural Resources

(1) Historical Resources

As discussed in Section IV.D, Cultural Resources, of this Draft EIR, the Project Site includes three potentially historic structures (i.e., the Mill Building, the Administration Building, and Stage 2), as well as the potential Mack Sennett Historic District. As illustrated in Figure 5 in the Historical Resources Report, included in Appendix F.1 of this Draft EIR, these potential historic resources are all located on the South Lot. As discussed in Section IV.D, Cultural Resources, of this Draft EIR, Project impacts to these historical resources would be less than significant after mitigation.

As with the Project, Alternative 4 would remove five buildings within the boundary of the potential Mack Sennett Historic District, two of which have been identified as contributors. Although the buildings are representative of support functions, characteristic of independent motion picture studios during the Major Studio Era, the buildings are not critical to understanding the historic significance of the Potential Mack Sennett Historic District, and the Historic District would still convey its significance with their removal. Thus, similar to the Project, potential impacts associated with the removal of contributing buildings would be less than significant.

As with the Project, Alternative 4 would involve the relocation and rehabilitation of the Arts/HR Building, a contributor to the potential Mack Sennett Historic District. Alternative 4 would also rehabilitate the Mack Sennett Building, the Administration Building, and Stage 2 and relocate and rehabilitate the Mill Building. Alternative 4 would implement the same mitigation measures as the Project as the Project (see Mitigation Measures CUL-MM-1 through CUL-MM-20, as set forth in Section IV.D, Cultural Resources, of this Draft EIR) in order to reduce potential impacts from the proposed relocation and rehabilitation of historic buildings. Similar to the Project, potential impacts associated with relocation and

rehabilitation of these buildings would be reduced to less-than-significant levels after mitigation under Alternative 4.

With respect to new construction, although this alternative would provide taller buildings, Alternative 4 would include the same development program and general layout as the Project. Thus, as with the Project, Alternative 4 would not materially impair the significance of any historical resources located on the Project Site. Thus, the potential impact from new construction would be less than significant.

As with the Project, Alternative 4 would include a Sign District. Thus, as with the Project, signs permitted under the Sign District proposed by Alternative 4 would also not diminish the integrity of any of the historical resources located on the Project Site, and all of the historical resources located on the Project Site would remain eligible for listing under national, state, and local landmark and historic district programs, as applicable. Thus, similar to the Project, potential impacts to historical resources from the proposed Sign District would be less than significant.

Overall, similar to the Project, potential impacts to historical resources under Alternative 4 would be less than significant after mitigation.

(2) Archaeological Resources

As detailed in Section IV.D, Cultural Resources, of this Draft EIR, the SLF records search results were negative for tribal cultural resources and the SCCIC records search did not identify any known archaeological resources within the Project Site. However, the geoarchaeological investigation conducted as part of the Archaeological Resources Assessment, included as Appendix F.2 of this Draft EIR, indicates that, while no artifacts were found, the Project Site may contain historical-period and prehistoric archaeological deposits. As such, there is high sensitivity for buried archaeological resources within the Project Site. As discussed in Section IV.D, Cultural Resources, of this Draft EIR, the Project's impacts on archaeological resources were concluded to be less than significant after mitigation (see Mitigation Measures CUL-MM-21 and CUL-MM-22).

As previously discussed, Alternative 4 would eliminate subterranean parking within the South Lot; accordingly, Alternative 4 would assume a smaller excavation footprint and require less excavation (up to 25 feet below grade compared to the 50 feet under the Project). Additionally, Alternative 4 would include less earthwork activities compared to the Project (approximately 335,000 cubic yards of cut compared to approximately 935,000 cubic yards of cut under the Project). Nonetheless, as with the Project, it is possible that excavation activities associated with Alternative 4 would have the potential to uncover previously unidentified archaeological resources. However, this potential is less than the Project due to the smaller excavation footprint and the reduction in excavation/cut activities. Alternative

4 would comply with the same regulatory requirements and implement the same mitigation measures as the Project. As such, as with the Project, potential impacts to archaeological resources under Alternative 4 would be less than significant after mitigation, and such impacts would be less than the less-than-significant-with-mitigation impacts of the Project due to the to the smaller excavation footprint and the reduction in excavation/cut activities.

(3) Human Remains

With regard to human remains, no known traditional burial sites have been identified on the Project Site. Section IV.D, Cultural Resources, of this Draft EIR concludes that through compliance with applicable regulatory requirements, potential impacts to human remains would be less than significant. As Alternative 4 results in reduced cut activities, potential impacts under Alternative 4 would also be less than significant but would be less when compared to the Project's less-than-significant impacts.

e. Energy

(1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

As with the Project, construction activities associated with Alternative 4 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be reduced compared to the Project due to the reduction in the overall amount of soil import/export. Furthermore, as with the Project, construction activities under Alternative 4 would comply with all applicable regulatory requirements relating to energy use. Therefore, as with the Project, short-term energy use during the construction of Alternative 4 would not occur in a wasteful, inefficient or unnecessary manner, and impacts would be less than significant and less than the less-than-significant impacts of the Project.

As with the Project, operation of Alternative 4 would generate an increase in the consumption of electricity and petroleum-based fuels compared to existing conditions. Alternative 4 would result in a net reduction in natural gas consumption due to compliance with the All-Electric Buildings Ordinance. Even though Alternative 4 would result in the same overall building square footage, this alternative would result in slightly less operational energy (electricity) demand associated with mechanical ventilation, which would not be required for the above-ground parking structures. All other operations would generate the same estimated energy demands as the Project, including fuel usage since the number of daily trips generated by this alternative would be the same as the Project. As with the Project, Alternative 4 would comply with applicable energy efficiency standards, and new buildings would be developed in accordance with the latest energy efficiency standards. Therefore,

as with the Project, long-term energy use during operation of Alternative 4 would not occur in a wasteful, inefficient, or unnecessary manner, and impacts would be less than significant and roughly similar to the less-than-significant impacts of the Project.

(2) Conflict with Plans for Renewable Energy or Energy Efficiency

As discussed above, Alternative 4 would result in slightly less operational energy demand than the Project since mechanical ventilation would not be required for the above-ground parking structures. All other operations would generate the same energy demands as the Project. Alternative 4 would comply with applicable energy efficiency standards, and the development would represent an infill project within an urbanized area that is well-served by public transportation, thus contributing to an energy efficient land use pattern consistent with SCAG's 2024–2050 RTP/SCS growth forecast. Therefore, similar to the Project, Alternative 4 would not conflict with applicable plans or policies regarding renewable energy and energy efficiency, and Alternative 4 would result in less-than-significant impacts.

f. Geology and Soils

(1) Geologic Hazards

The Project Site is located within the seismically active region of Southern California. As discussed in Section IV.F, Geology and Soils, of this Draft EIR, with compliance with applicable regulatory requirements, Project impacts associated with geologic hazards would be less than significant. As previously described, Alternative 4 would continue to be developed within the Project Site; thus, under Alternative 4, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, liquefaction, seismically induced settlement, subsidence, and expansive soils, would be similar to those under the Project, since geological hazards impacts are a function of a site's underlying geologic conditions rather than the type of land uses or amount of development proposed, and the development area of Alternative 4 would be similar to the Project. As with the Project, Alternative 4 would be subject to the same regulations, including the applicable provisions in the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the California Building Code, the City's General Plan Safety Element, and the Los Angeles Building Code. Furthermore, as with the Project, Alternative 4 would be required to demonstrate compliance with the applicable provisions of these safety requirements before permits can be issued for construction. Accordingly, Alternative 4 would comply with all applicable regulatory requirements, including applicable provisions of the Los Angeles Building Code relating to seismic safety, and accepted and proven construction engineering practices would be implemented, including the geotechnical design recommendations set forth in a development-specific geotechnical investigation and similar to Project Design Feature GEO-PDF-1 included for the Project in Section IV.F, Geology and Soils, of this Draft

EIR. Lastly, as with the Project, Alternative 4 would not include uses, such as mining operations, exceptionally deep excavations, or the boring of large areas, to create unstable seismic conditions. Overall, impacts related to geology and soils under Alternative 4 would be less than significant, and such impacts would be similar to the Project's less-than-significant impacts.

(2) Paleontological Resources

As discussed in Section IV.F, Geology and Soils, of this Draft EIR, a records search at the NHMLA did not identify any known paleontological resources within the Project Site. However, as evaluated in the Paleontological Resources Report, included as Appendix H.3 of this Draft EIR, both Pleistocene-age alluvial fan deposits underlying the Project Site and the nearby Modelo Formation have produced significant fossil specimens and are, therefore, assigned a high paleontological potential. As discussed in Section IV.F, Geology and Soils, of this Draft EIR, with implementation of Mitigation Measure GEO-MM-1, potential Project impacts associated with uncovering of paleontological resources would be reduced to less-than-significant levels.

As previously discussed, Alternative 4 would eliminate subterranean parking within the South Lot; therefore, Alternative 4 would assume a smaller excavation footprint and require less excavation (up to 25 feet below grade compared to the 50 feet under the Project). Additionally, Alternative 4 would include approximately 335,000 cubic yards of cut compared to approximately 935,000 cubic yards of cut under the Project. Nonetheless, as with the Project, it is possible that excavation activities associated with Alternative 4 have the potential to uncover previously unidentified paleontological resources. However, this potential is less than the Project due to the smaller excavation footprint and the reduction in excavation/cut activities. Alternative 4 would also comply with the same applicable regulatory requirements and implement the same mitigation as the Project to address potential impacts to paleontological resources. As such, as with the Project, impacts to paleontological resources would be less than significant after mitigation, and such impacts would be less when compared to the Project's less-than-significant- impacts after mitigation due to the smaller excavation footprint and the reduction in excavation/cut activities.

g. Greenhouse Gas Emissions

(1) Construction

Under Alternative 4, the overall amount of building construction would be the same as the Project. However, construction of Alternative 4 would require approximately 68 percent less export of soil and less emissions associated with grading and hauling. Under Alternative 4, the overall construction duration would be reduced in comparison to the Project due to the reduction in excavation quantities. Thus, construction of Alternative 4 would result in reduced

GHG emissions as compared to the Project. As a result, as with the Project, GHG emissions during the construction of Alternative 4 would be less than significant. Such impacts would be less when compared to the Project's less-than-significant impacts.

(2) Operation

As discussed in Section IV.G, Greenhouse Gas Emissions, of this Draft EIR, GHG emissions from a development project are determined in large part by the number of daily trips generated and the energy consumption associated with the proposed land uses. As discussed in the transportation analysis below, development of Alternative 4 would result in the same number of daily vehicle trips and VMT as the Project. As vehicular emissions depend on the number of trips and VMT, vehicular sources would result in no change in air emissions compared to the Project. Even though Alternative 4 would result in the same amount of overall building square footage, this alternative would result in slightly less operational GHG emissions associated with energy usage since mechanical ventilation would not be required for below-grade parking structures. All other operations would produce the same estimated amount of GHG emissions as the Project. Thus, the amount of GHG emissions generated by Alternative 4 would be roughly similar to the Project. As with the Project, Alternative 4 would be designed to comply with the Los Angeles Green Building Code and All-Electric Buildings Ordinance, as applicable, and would incorporate sustainability features to reduce GHG emissions. Specifically, as with the Project, Alternative 4 would include rooftop solar panels. Furthermore, as with the Project, Alternative 4 would represent infill development within an urban area that is well-served by public transportation and, thus, would contribute to an energy efficient land use pattern, which would support the goals of the RTP/SCS intended to reduce GHG emissions. Therefore, as with the Project, Alternative 4 would be consistent with the applicable GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans, and GHG emission impacts would be less than significant. Such impacts would be similar to the Project's less-than-significant impacts.

h. Hazards and Hazardous Materials

(1) Construction

As with the Project, hazardous materials, such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, would be used and, therefore, would require proper handling, management, and, in some cases, disposal. As discussed for the Project in Section IV.H, Hazards and Hazardous Materials, of this Draft EIR, all potentially hazardous materials required during construction of Alternative 4 would also be handled and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing associated risks. As such,

similar to the Project, impacts associated with the use of hazardous materials during construction would be less than significant.

With regard to potential risk of accident or upset conditions, while Alternative 4 would involve the same types of construction activities as the Project, this alternative would eliminate below-grade parking within the South Lot, excavation/earthwork activities would be reduced. As with the Project, Alternative 4 would have the potential to encounter ACMs, LBP, contaminated soil, and contaminated groundwater. However, such potential (with respect to contaminated soil and groundwater) would be reduced as compared to the Project due to the smaller excavation footprint and the reduced excavation/earthwork activities under this alternative. As with the Project, Alternative 4 would comply with all applicable regulatory requirements related to hazards, and Alternative 4 would implement the same mitigation measure as the Project, requiring a Soil Management Plan and Health and Safety Plan, as well as the same design features (e.g., requiring an updated Spill Prevention, Control, and Countermeasure Plan). Thus, as with the Project, under Alternative 4, potential impacts associated with risk of hazards and emission or handling of hazardous waste within 0.25 miles of a school during construction would be less than significant after mitigation. Such impacts would be less when compared to the Project's less-than-significant impact after mitigation.

With respect to the Project Site's listing on a hazardous materials site, as discussed in Section IV.H, Hazards and Hazardous Materials, of this Draft EIR, the Project Site is recorded on the "HIST CORTESE" list of sites compiled pursuant to Government Code Section 65962.5 in reference to the LUST file closed by the LARWQCB in January of 1997. This case was associated with USTs damaged during the Northridge Earthquake. The five USTs were removed in 1994 under a permit by the LAFD. Impacted soil was removed for off-site disposal, and groundwater monitoring was required by the LARWQCB in May of 1994. Monitoring of soil vapor and groundwater was conducted, and the LARWQCB closed the LUST file in January of 1997. As set forth in Section IV.H, Hazards and Hazardous Materials, of this Draft EIR, implementation of Mitigation Measure HAZ-MM-1 would reduce any potential impacts associated with this case to a less-than-significant level. As with the Project, Alternative 4 would implement the same mitigation measure. Thus, similar to the Project, potential impacts associated with listing on a hazardous materials site would be less than significant after mitigation.

Overall, as with the Project, impacts related to hazards and hazardous materials during construction under Alternative 4 would be less than significant after mitigation. Such impacts would be less when compared to the Project's less-than-significant impact after mitigation due to the reduction in excavation.

(2) Operation

As with the Project, operation of Alternative 4 would involve the use of limited quantities of potentially hazardous materials typical of those used in studio campuses, including paints, adhesives, fuels, pesticides for landscaping, cleaning and maintenance supplies, materials for pyrotechnic special effects, and other general products related to studio operations. As with the Project, all hazardous materials on the Project Site under Alternative 4 would be handled, used, stored, and disposed of in accordance with all applicable local, state, and federal regulations. As with the Project, Alternative 4 would include design features requiring the preparation or updating of safety and emergency plans. Such safety and emergency plans would include the Spill Prevention, Control, and Countermeasure Plan, the Radford Studio Center Emergency Action Plan, and the Radford Studio Center IIPP, including the Radford Studio Center Safety Manual. Overall, similar to the Project, impacts under Alternative 4 would be less than significant.

i. Hydrology and Water Quality

(1) Surface Water Quality

(a) Construction

Similar to the Project, Alternative 4 would include the same development program, floor area, and general layout as the Project, except all new parking within the South Lot would be located in at- or above-ground structures. Alternative 4 would require a maximum excavation depth of approximately 25 feet and, as such, temporary dewatering may be required. However, with the reduction in grading and depth of excavation, temporary dewatering would be reduced under Alternative 4. Like the Project, Alternative 4 would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows. In addition, in the event dewatering is required, as with the Project, temporary dewatering pumps and filtration would be used during construction of Alternative 4 in compliance with the NPDES permit. These temporary systems would comply with all applicable NPDES requirements related to construction and discharges from dewatering operations, as well as the LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties.

With the implementation of SWPPP and site-specific BMPs, Alternative 4 would reduce or eliminate the discharge of potential pollutants into stormwater runoff. In addition, construction of Alternative 4 would be required to comply with City grading permit regulations, which require the preparation and implementation of necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspections to reduce sedimentation and erosion. Furthermore, Alternative 4 would also be subject to Los Angeles County Flood Control District permit requirements, which prohibit

construction within the channel during the rainy season (October 15 to April 15) and require that at least 33 percent of the channel be available for flow through with a temporary diversion for the remainder of the year.

Overall, with compliance with NPDES requirements, site-specific BMPs included as part of the SWPPP, and all applicable City and County of Los Angeles regulations, construction of Alternative 4 would not result in discharges that violate any water quality standard or waste discharge requirements or otherwise substantially degrade water quality. Therefore, as with the Project, construction-related impacts to surface water quality under Alternative 4 would be less than significant, and such impacts would be less when compared to the less-than-significant impacts of the Project due to the reduction in earthwork and depth of grading.

(b) Operation

Like the Project, pollutants to the stormwater system potentially generated by Alternative 4 would include sediment, nutrients, pesticides, metals, pathogens, and oil and grease, similar to existing conditions. Also similar to the Project, Alternative 4 would implement BMPs for managing stormwater runoff in accordance with the City's LID Ordinance requirements. Due to the incorporation of the LID BMPs, operation of Alternative 4 would not result in discharges that would violate any surface water quality standards or waste discharge requirements, nor would the Project create substantial additional sources of polluted runoff, which could substantially degrade surface water quality. Thus, as with the Project, impacts to surface water quality during operation of Alternative 4 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(2) Groundwater Quality

(a) Construction

Similar to the Project, Alternative 4 could require temporary dewatering during construction, which would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit and applicable LARWQCB requirements. As such, groundwater quality would not be negatively affected by potential dewatering activities. However, the amount of dewatering required could be potentially reduced under Alternative 4 due to the reduction in grading activities and depth of excavation.

As discussed in Section IV.H, Hazards and Hazardous Materials, of this Draft EIR, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and, therefore, would require proper management and, in some cases, disposal. The management of any resultant hazardous wastes that may be encountered could increase the

potential for hazardous materials to be released into groundwater if these materials are released while the site soils are exposed. As with the Project, Alternative 4 would comply with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste. With compliance with all applicable regulations, the potential for the construction of Alternative 4 to release contaminants into groundwater that could affect existing contaminants, expand the area of groundwater contamination, or increase the level of contamination would be reduced. In addition, as there are no existing groundwater production wells or public water supply wells within one mile of the Project Site, construction activities would not be anticipated to affect existing wells.

In addition, like the Project, Alternative 4 would have the potential to encounter contaminated soils, which could potentially affect groundwater. However, such potential would be reduced as compared to the Project due to the smaller excavation footprint and the overall reduced earthwork activities under this alternative. As with the Project, any contaminated soils found during excavation would be captured within the volume of excavated material and would be removed from the Project Site and remediated at an approved disposal facility in accordance with applicable regulatory requirements. Lastly, as there are no oil wells on the Project Site, construction activities under Alternative 4 also would not disturb existing oil wells which could impact groundwater quality.

Based on the above, overall impacts with respect to groundwater quality during construction under Alternative 4 would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project, due to the reduction in earthwork and depth of excavation.

(b) Operation

As discussed in Section IV.I, Hydrology and Water Quality, of this Draft EIR, in general, operational activities that could affect groundwater quality include spills of hazardous materials and leaking USTs. As discussed in Section IV.I, Hazards and Hazardous Materials, of this Draft EIR, no USTs are currently operated at the Project Site. Therefore, as with the Project, Alternative 4 would not disturb existing USTs and Alternative 4 would not introduce any new USTs that would have the potential to expose groundwater to contaminants. In addition, as with the Project, Alternative 4 would incorporate source control measures per the City's LID requirements, including good housekeeping, removal of trash and maintenance of driveways and parking areas, and proper use and storage of pesticides, which would reduce water quality impacts and prevent pollutants from entering the groundwater by percolation within landscaped areas or other permeable surfaces. Overall, as with the Project, impacts with respect to groundwater quality during operation of Alternative 4 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(3) Surface Water Hydrology

(a) Construction

Similar to the Project, construction activities for Alternative 4 would include the same development program, floor area, and general layout as the Project, except all new parking within the South Lot would be located in at- or above-ground structures. As such, Alternative 4 would include less grading and a reduced depth of excavation (up to 25 feet below grade compared to the 50 feet under the Project). Similar to the Project, Alternative 4 would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, Alternative 4 would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows. In addition, Alternative 4 construction activities would be required to comply with all applicable City grading permit regulations, which require the preparation and implementation of necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspections to reduce sedimentation and erosion. Furthermore, Alternative 4 would also be subject to Los Angeles County Flood Control District permit requirements, which prohibit construction within the channel during the rainy season (October 15 to April 15) and require that at least 33 percent of the channel be available for flow through with a temporary diversion for the remainder of the year. Thus, through compliance with all NPDES Construction General Permit requirements, including the preparation of a SWPPP, implementation of BMPs, as well as compliance with applicable City grading permit regulations, Alternative 4 would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, or flooding on- or off-site. Therefore, construction-related impacts to surface water hydrology under Alternative 4 would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project due to the overall reduction in grading.

(b) Operation

Alternative 4 would include the development of new buildings, paved areas, and landscaped areas. As with the Project, it is anticipated that Alternative 4 would decrease impervious surfaces on the Project Site compared to existing conditions. The extent to which impervious surfaces would be reduced would be similar to the Project since Alternative 4 would include the same development program, square footages, and general layout as the Project. As with the Project, with the introduction of new landscaped areas and other pervious areas as part of Alternative 4 as well as incorporation of BMPs in accordance with the City's LID requirements, the overall runoff flow volume would decrease compared to existing conditions, similar to the Project.

Overall, operation of Alternative 4 would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion, siltation, or on- or off-site flooding would occur. In addition, the alternative would not create or contribute

runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, operational impacts to surface water hydrology under Alternative 4 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(4) Groundwater Hydrology

(a) Construction

As previously discussed, as with the Project, Alternative 4 could require a temporary dewatering system during construction, which would occur pursuant to, and comply with, all applicable regulatory requirements. Any discharge of groundwater during construction of Alternative 4 would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit and applicable LARWQCB requirements. As discussed in Section IV.I, Hydrology and Water Quality, of this Draft EIR, no water supply wells are located at the Project Site or within one mile of the Project Site that could be impacted by construction. In addition, as with the Project, Alternative 4 would not include the construction of water supply wells. Therefore, impacts on groundwater hydrology during construction of Alternative 4 would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project due to reduced grading and depth of excavation.

(b) Operation

As with the Project, it is anticipated that Alternative 4 would decrease impervious surfaces on the Project Site compared to existing conditions due to the implementation of new landscaping and other pervious areas. In addition, as with the Project, Alternative 4 would include the installation of BMPs in accordance with the City's LID requirements in order to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site. As discussed for the Project in Section IV.I, Hydrology and Water Quality, of this Draft EIR, regardless of the BMPs ultimately installed, a portion of the stormwater would be captured to be infiltrated into the ground while the excess stormwater would bypass the BMP systems and discharge to the Los Angeles River through an existing or proposed piped connection. This excess stormwater would not have the opportunity to discharge or infiltrate into the ground and would thus not affect groundwater hydrology, including the direction of groundwater flow. Therefore, as with the Project, Alternative 4 would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management, and impacts on groundwater hydrology during operation of Alternative 4 would be less than significant. Such impacts would be similar to the less-than-significant impacts of the Project.

j. Land Use and Planning

As previously described, Alternative 4 would involve the development of the same land uses and floor area as the Project and a similar site plan. However, building heights would be increased due to the elimination of below-grade parking within the South Lot. Like the Project, Alternative 4 would establish height subareas with specified height limits and limited height allowances to regulate building heights throughout the Project Site, with taller maximum heights concentrated toward the center of the Project Site, away from Site edges. Alternative 4 also includes similar on- and off-site improvements as the Project, including the Radford Bridge, Mobility Hubs, and Class IV bikeway. Alternative 4 would include the same entitlements as the Project, including a General Plan Amendment, a Vesting Zone Change and Height District Change, adoption of the Radford Studio Center Specific Plan, establishment of a Sign District, and a Development Agreement.

As discussed in Section IV.J, Land Use and Planning, of this Draft EIR, the Project was determined to be overall consistent with the applicable plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect and such impacts were concluded to be less than significant. Thus, with a similar development program and site plan, Alternative 4 would also be generally consistent with the same plans, policies, and regulations that were adopted to avoid or mitigate an environmental effect, including, but not limited to, the City's General Plan Framework Element, the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan, the LAMC, and SCAG's 2024–2050 RTP/SCS. Therefore, the impacts of Alternative 4 related to potential conflicts with applicable land use plans, policies, or regulations would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

k. Noise

(1) Noise

(a) Construction

The construction activities and associated equipment under Alternative 4 would be similar to the Project based on the same total floor area. As with the Project, construction of Alternative 4 would generate noise from the use of heavy-duty construction equipment, as well as from haul truck and construction worker trips. Under Alternative 4, the on-site construction activities and the associated construction noise levels would be similar to those of the Project on maximum activity days since the daily intensity of construction activities would be similar to the Project. However, Alternative 4 would include a smaller number of truck trips on peak construction days (i.e., 282 trucks versus 448 trucks per day under the Project), due to the relocation of the subterranean parking levels to above grade. Therefore, noise levels associated with off-site trucks would be reduced under Alternative 4, ranging from 1.1 dBA (L_{eq}) lower along Laurel Canyon Boulevard and Ventura Boulevard; 1.3 dBA

(L_{eq}) lower along Moorpark Street and Colfax Avenue; and 1.8 dBA (L_{eq}) lower along Radford Avenue, as compared to the Project. However, the estimated off-site construction noise level along Radford Avenue would still exceed the significance threshold by up to 4.3 dBA (L_{eq}). Alternative 4 would implement similar mitigation measures as the Project, which would minimize construction noise. Nonetheless, on- and off-site construction noise impacts (both project-level and cumulative) would be significant and unavoidable under Alternative 4, and such impacts would be overall less than the Project's significant and unavoidable impacts since the off-site construction noise levels would be reduced under Alternative 4.

(b) Operation

As discussed in Section IV.K, Noise, of this Draft EIR, sources of operational noise under the Project would include on-site stationary noise sources, including mechanical equipment, outdoor studio production activities (outdoor production and basecamp), parking facilities, loading docks and trash compactors, and off-site mobile (roadway traffic) noise sources. Alternative 4 would introduce similar noise sources as the Project. It is anticipated that the noise levels from building mechanical equipment, outdoor studio production activities, parking facilities, and loading docks and trash compactors would be similar to the Project, based on the same total floor area. As with the Project, Alternative 4 would implement Project Design Feature NOI-PDF-1 requiring acoustic screening of mechanical equipment and Project Design Feature NOI-PDF-2 providing limits on outdoor studio production activities to occur along the perimeter of the Project Site without prior notification of residents within a 500-foot radius of the property. Accordingly, operational on-site noise impacts under Alternative 4 would be less than significant and similar when compared to the less-than-significant impacts of the Project.

With regard to operational off-site (traffic) noise, Alternative 4 would generate the same operational trip generation as the Project based on the same development program. Therefore, off-site noise impacts under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

As noted above, the types of on-site construction activities and associated equipment under Alternative 4 would be similar to the Project. The on- and off-site vibration levels during construction would be similar to those of the Project, as construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment. As such, peak vibration levels generated by construction equipment and construction truck trips under Alternative 4 would be similar to those of the Project. Accordingly, construction activities under Alternative 4 would result in similar significant and

unavoidable on- and off-site vibration impacts based on the significance threshold for human annoyance and less-than-significant on- and off-site vibration impacts based on the significance threshold for building damage as the Project.

(b) Operation

As described in Section IV.K, Noise, of this Draft EIR, sources of vibration related to Project operations would include vehicle circulation, delivery trucks, and building mechanical equipment. These same sources of operational vibration would occur under Alternative 4. As with the Project, vehicular-induced vibration from Alternative 4, including vehicle circulation within the parking areas, would not generate perceptible vibration levels at off-site sensitive uses. In addition, as with the Project, building mechanical equipment installed as part of Alternative 4 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include vibration-attenuation mounts to reduce vibration transmission such that the vibration would not be perceptible at any off-site sensitive receptors. Therefore, as with the Project, operation of Alternative 4 would not increase vibration levels in the immediate vicinity of the Project Site. As such, vibration impacts associated with operation of Alternative 4 would also be less than significant and similar to the less-than-significant impacts of the Project.

I. Public Services

(1) Fire Protection

(a) Construction

The types of construction activities required for Alternative 4 would be similar to those of the Project, although the amount of excavation activities and associated soil export and truck trips would be reduced due to the elimination of subterranean parking within the South Lot. As discussed in Section IV.L.1, Public Services—Fire Protection, of this Draft EIR, construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings, and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. As with the Project, in accordance with OSHA safety and health regulations, construction managers and personnel for Alternative 4 would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities. Additionally, in accordance with OSHA provisions, fire suppression equipment (e.g., fire extinguishers) specific to construction activities would be maintained on-site. Additionally, as with the Project, construction of Alternative 4 would comply with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, as with the Project, compliance with applicable regulatory requirements under Alternative 4 would effectively reduce the potential for construction

activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials, thereby reducing the potential demand on fire protection services at the Project Site during construction.

Additionally, as with the Project, construction activities associated with Alternative 4 would also add construction vehicles to the street network and could necessitate temporary partial lane closures for installation of required utility and street improvements. However, as with the Project, travel lanes would be maintained in each direction on all streets around the construction site throughout the construction period for Alternative 4, and emergency access would be maintained. In addition, like the Project, Alternative 4 would include implementation of a Construction Traffic Management Plan to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Also, as with the Project, Alternative 4 would include temporary traffic controls such as flag persons to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of vehicles that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, dedicated turn lanes for construction trucks, rerouting of construction trucks to reduce travel on congested streets, etc.) would also be implemented, as necessary, to ensure emergency access to the construction site and traffic flow on adjacent rights-of-way are maintained. Additionally, haul truck staging would be prohibited on any streets adjacent to the Project Site, unless specifically approved as a condition of an approved haul route. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Therefore, construction of Alternative 4, like the Project, would not require a new fire station or the expansion of an existing facility in order to maintain service levels, the construction of which would cause significant environmental impacts. As Alternative 4 would reduce the amount of excavation activities and construction traffic, there would also be reduced risk for construction-related fire and explosion, further reducing the need for new or altered government facilities compared to the Project. Impacts under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduced amount of grading.

(b) Operation

Alternative 4 would involve the same land uses, floor area, and associated employment generation as the Project and, thus, the number of new employees and visitors present on-site would be the same as the Project. As such, this alternative would generate a similar demand for LAFD fire protection services on a daily basis. Similar to the Project, Alternative 4 would comply with applicable Los Angeles Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage

and management of hazardous materials, alarms, communications systems, and life safety features (e.g., automatic fire sprinkler systems, fire service access elevators, etc.) and would undergo LAFD fire/life safety plan review, which would reduce the demand for fire protection and emergency medical services and also ensure adequate emergency access. Furthermore, as with the Project, traffic generated by Alternative 4 would not significantly impact emergency vehicle response to the Project Site and surrounding area, as the drivers of emergency vehicles have the ability to bypass traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As with the Project, Alternative 4'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.

Additionally, Alternative 4 would be expected to have the same fire flow requirement as the Project (i.e., 6,000 to 9,000 gpm from four to six hydrants flowing simultaneously), and, thus, as with the Project, following the installation of additional hydrants, LADWP would be able to supply sufficient flow and pressure to satisfy the fire suppression needs of Alternative 4.

Alternative 4 would also generate General Fund tax revenues for the City that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate. Therefore, similar to the Project, Alternative 4 would not result in the need for new or physically altered government facilities (i.e., fire stations), the construction of which could cause significant environmental impacts, in order to maintain service ratios, and impacts to fire protection associated with operation of Alternative 4 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(2) Police Protection

(a) Construction

As discussed above, the types of construction activities under Alternative 4 would be similar to those of the Project; however, the amount of excavation activities and associated soil export and truck trips would be reduced due the elimination of subterranean parking within the South Lot. Similar to the Project, construction of Alternative 4 would not generate a permanent population on the Project Site that would substantially increase the police service population of the North Hollywood Community Police Station because the daytime population generated during construction would be temporary in nature. In addition, the Project Site would continue to be enclosed with fencing, walls, or other barriers to prevent unauthorized access, and access to the site would continue to be controlled by staffed guard houses. Alternative 4 would also implement similar project design features as the Project, which would include additional temporary security measures such as appropriate lighting,

locked entry, and security patrols during construction, thereby reducing demand for police protection services. Therefore, as with the Project, construction of Alternative 4 would not contribute to a temporary increased demand for police protection services.

Furthermore, as previously discussed, while construction activities associated with Alternative 4 would also add construction vehicles to the street network and could necessitate temporary partial lane closures for installation of required utility and street improvements, as with the Project, travel lanes would be maintained in each direction on all streets around the construction site throughout the construction period for Alternative 4, and emergency access would be maintained. In addition, like the Project, Alternative 4 would include implementation of a Construction Traffic Management Plan to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Also, as with the Project, Alternative 4 would include temporary traffic controls such as flag persons to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of vehicles that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, dedicated turn lanes for construction trucks, rerouting of construction trucks to reduce travel on congested streets, etc.) would also be implemented, as necessary, to ensure emergency access to the construction site and traffic flow on adjacent rights-of-way are maintained. Additionally, haul truck staging would be prohibited on any streets adjacent to the Project Site, unless specifically approved as a condition of an approved haul route. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Overall, construction of Alternative 4, like the Project, would not require a new police station or the expansion of an existing facility in order to maintain service levels, the construction of which would cause significant environmental impacts. As such, impacts on police protection during construction of Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project due to the reduction in haul truck trips.

(b) Operation

As discussed in Section IV.L.2, Public Services—Police Protection, of this Draft EIR, the LAPD considers the residential population within their service area to evaluate service capacity. As previously discussed, Alternative 4 would include the same development program and floor area as the Project, except all new parking within the South Lot would be located in at- or above-ground structures. As such, Alternative 4 would generate the same service population as the Project. As Alternative 4 would not include residential uses, this alternative would not introduce a new permanent residential population to the Project Site that could generate a direct demand for police protection services. Therefore, as no

residential uses are proposed, Alternative 4 would not increase the LAPD residential service population in the North Hollywood Division.

Alternative 4 would also implement similar security features as the Project to enhance safety within and immediately surrounding the Project Site, which would reduce the demand for police protection services, including a 24/7 security plan, private on-site security staff, and regular security patrols. In addition to these security features, Alternative 4, as with the Project, would also generate General Fund tax revenues for the City that could be used to expand law enforcement resources in the North Hollywood Division, similar to the Project. Therefore, Alternative 4, like the Project, would not result in the need to construct new police protection facilities or modify existing facilities, the construction of which would cause significant environmental impacts, in order to maintain service ratios, and impacts to police protection associated with operation of Alternative 4 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

m. Transportation

As previously described, Alternative 4 would be developed within the same Project Site as the Project. As such, the plans, policies, and programs applicable to the Project would also apply to Alternative 4. These include the Mobility Plan, Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan, Plan for a Healthy Los Angeles, the LAMC, the CVC, Vison Zero, RIO, and Citywide Design Guidelines. As with the Project, Alternative 4 would not conflict with these plans, policies and regulations. In particular, Alternative 4 would include the Radford Bridge that would provide pedestrian and bicycle connections within the Project Site vicinity, the Mobility Hubs, which would promote TDM and reduce VMT, and the Class IV bikeway along Radford Avenue that would promote bicycle access in the Project Site vicinity. Like the Project, Alternative 4 would also prioritize safety and access for all individuals utilizing the Project Site by complying with all applicable ADA and LAMC requirements related to pedestrian, vehicle and bicycle access. Furthermore, like the Project, Alternative 4 represents urban infill development within a SCAG-designated Livable Corridor and HQTC in close proximity to transit and housing, which would encourage alternative transportation use and a reduction in VMT. As with the Project, Alternative 4 would also promote pedestrian activity and reduce VMT by providing convenient and adequate bicycling facilities; and enhancing the streetscape adjacent to the Project Site through the provision of new landscaping and street trees, lighting, wayfinding signage, and pedestrian/transit amenities such as benches and a protected bikeway. Like the Project, Alternative 4 would also implement a TDM Program to reduce VMT, consistent with the goals of the Mobility Plan, Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan, and the City's TDM Ordinance. Therefore, as with the Project, Alternative 4 would not conflict with any applicable program, plan, ordinance, or policy addressing the circulation system. Impacts would be less than significant and similar to the less-than-significant impacts of the Project.

With respect to VMT, Alternative 4 would result in the same daily work VMT (6.2 VMT per employee) as the Project, as this alternative would include the same proposed development program, except all new parking within the South Lot would be located in at- or above-ground structures.[19] As such, like the Project, Alternative 4 would not exceed the work VMT per employee significance threshold of 11.6 for the South Valley APC. Therefore, like the Project, Alternative 4 would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b) regarding VMT, and impacts would be less than significant. Impacts would be similar to the Project.

Regarding freeway safety, as required by LADOT's Interim Guidance for Freeway Safety Analysis, if a project is not expected to generate more than 25 or more peak-hour trips at any freeway off-ramps, then a freeway ramp analysis is not required. As discussed in Section IV.M, Transportation, of this Draft EIR, the Project would add 25 or more peak-hour trips to the surrounding off-ramps during the morning and afternoon peak. Alternative 4 would have the same land use program as the Project and would generate the same number of peak-hour trips as the Project. Therefore, similar to the Project, none of the four analyzed off-ramps would have queues that would both exceed the ramp storage length and include Alternative 4 related vehicles that would add 50 or more feet to any queue during any of the analyzed peak hours compared to Future without Project Condition (Year 2028 and Year 2045). Thus, consistent with the Project, Alternative 4 would neither be subject to speed differential analyses nor cause a significant safety impact, and no mitigation is required.

n. Tribal Cultural Resources

As discussed in Section IV.N, Tribal Cultural Resources, of this Draft EIR, the SLF records search results were negative for tribal cultural resources and the SCCIC records search did not identify any known tribal cultural resources within the Project Site. Additionally, the geoarchaeological investigation conducted as part of the TCR Report, included as Appendix P, indicates that while no artifacts were found, the Project Site may contain historical-period archaeological deposits and prehistoric archaeological deposits. Therefore, the entire Project Site is considered highly sensitive for tribal cultural resources. As discussed in Section IV.N, Tribal Cultural Resources, of this Draft EIR, the Project's impacts on tribal cultural resources were concluded to be less than significant with implementation of mitigation measures.

As previously discussed, Alternative 4 would eliminate subterranean parking within the South Lot; therefore, Alternative 4 would include reduced grading (approximately 335,000 cubic yards of cut compared to approximately 935,000 cubic yards of cut under the Project) as well as a reduction in the depth of excavation (up to 25 feet below grade compared to 50

[19] *See Appendix R.1 of this Draft EIR for VMT Calculator Outputs for Alternatives.*

feet under the Project). Like the Project, Alternative 4 has the potential to uncover previously unidentified tribal cultural resources; however, this potential is less than the Project due to the reduced grading and depth of excavation. Alternative 4 would implement Mitigation Measure TR-MM-1 to address potential impacts to tribal cultural resources. As such, like the Project, impacts with respect to tribal cultural resources would be less than significant with mitigation, and such impacts would be less than the less-than-significant-with-mitigation impacts of the Project.

o. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities for Alternative 4 would result in a temporary water demand for dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. Construction-related water use under Alternative 4 would be reduced as compared to the Project, as this alternative would involve substantially less earthwork due to the elimination of below-grade parking within the South Lot. This would reduce the amount of water needed for dust control. Like the Project, while Alternative 4 would require trenching for connection to the existing water mains in the adjacent streets similar to the Project, Alternative 4 would similarly implement a Construction Traffic Management Plan to ensure the safe and efficient flow of pedestrian and vehicular traffic around the Project Site during construction. In addition, as with the Project, Alternative 4 would construct all water mains and connections in accordance with applicable regulatory requirements to ensure the long-term service of water in the Project Site vicinity and adequate fire flow to the Project Site. Thus, the construction of these water mains and improvements would not result in significant environmental impacts related to utility infrastructure. Therefore, impacts under Alternative 4 related to water supply and infrastructure during construction would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project due to the reduction in grading. Refer to Section IV.K, Noise, of this Draft EIR regarding the potential construction noise impacts associated with the water infrastructure improvements.

(b) Operation

As discussed in Section IV.O.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, based on the WSA prepared for the Project, operation of the Project would generate a demand for water that would be accommodated by LADWP's future water supplies, and impacts associated with the demand for water would be less than significant. As with the Project, Alternative 4 would result in an increase in long-term water demand. Because this alternative would include the same proposed development program and floor area as the Project, the increase in long-term water demand would be the same.

Thus, as with the Project, LADWP would have sufficient water supplies available to serve Alternative 4 and reasonably foreseeable future development during normal, dry, and multiple dry years. In addition, Alternative 4 would be expected to have the same fire flow requirement as the Project and would incorporate similar water infrastructure improvements as the Project to meet the required fire flow. Therefore, impacts under Alternative 4 related to water supply and infrastructure during operation would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

As discussed in Section IV.O.2, Utilities and Service Systems—Wastewater, of this Draft EIR, wastewater generation may occur incrementally throughout construction of Alternative 4. As with the Project, temporary facilities for construction workers, such as portable toilets and hand wash areas, would be provided by the construction contractor. Sewage generated from these facilities would be collected and hauled off-site and would not be discharged directly into the public sewer system. As such, construction would not contribute directly to the wastewater system that serves the Project Site. While the sewage hauled off-site would eventually be deposited at the HWRP, the amount generated during construction activities would be a fraction of what is currently generated by the existing uses to be removed. Thus, wastewater generation from construction of Alternative 4 is not anticipated to cause a measurable increase in wastewater flows that would result in the need for new or expanded wastewater treatment facilities.

As with the Project, new sewer line connections would be required to connect the proposed buildings to the main sewer infrastructure system in the streets surrounding the Project Site. Construction impacts associated with new connections would primarily be confined to trenching in order to place the sewer line connections below the surface to connect to the existing off-site public infrastructure, and any off-site work that could potentially affect existing sewer service to adjacent properties would be coordinated with the City of Los Angeles Bureau of Engineering. As with the Project, Alternative 4 would similarly implement a Construction Traffic Management Plan to ensure the safe and efficient flow of pedestrian and vehicular traffic around the Project Site during construction. As such, construction of Alternative 4, as with the Project, would not require or result in the relocation or construction of new or expanded wastewater facilities, the construction or relocation of which could cause significant environmental effects related to utilities during the construction period. Therefore, similar to the Project, impacts under Alternative 4 related to wastewater during construction would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project. Refer to Section IV.K, Noise, of this Draft EIR regarding the potential construction noise impacts associated with wastewater infrastructure improvements.

(b) Operation

As discussed in Section IV.O.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the Project would result in less-than-significant impacts associated with wastewater treatment capacity and conveyance. As with the Project, operation of Alternative 4 would increase wastewater flows from the Project Site compared to existing conditions. Because this alternative would include the same proposed development program and floor area as the Project, wastewater flows would be the same. As operational wastewater generation under Alternative 4 would be the same as for the Project, the HWRP would have adequate capacity to serve Alternative 4.

As concluded in Section IV.O.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the sewer lines serving the Project Site have adequate capacity to serve the Project. Since Alternative 4 would generate the same amount of wastewater as the Project, the local sewer lines would also have adequate capacity to serve Alternative 4. Also, as with the Project, detailed gauging and evaluation would be conducted for Alternative 4, as required by LAMC Section 64.14, to obtain final approval of a sewer capacity and connection permit during the permitting process. Furthermore, as with the Project, all sanitary sewer connections and on-site infrastructure under Alternative 4 would be designed and constructed in accordance with applicable regulatory standards.

Based on the above, impacts under Alternative 4 related to wastewater during operation would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(3) Solid Waste

(a) Construction

As discussed in Section IV.O.3, Utilities and Service Systems—Solid Waste, of this Draft EIR, the Project would result in less-than-significant impacts associated with solid waste during construction. Under Alternative 4, the amount of demolition waste generated by Alternative 4 would be similar to the Project, and the amount of construction waste would be similar since the total floor area would be the same. Therefore, given that the amount of demolition and construction waste would be similar to the Project, existing landfills would also be capable of accommodating the demolition and construction waste from Alternative 4. Furthermore, similar to the Project, construction of Alternative 4 would not conflict with any applicable local, state, and federal regulations regarding solid waste disposal. As such, solid waste impacts during construction would be less than significant under Alternative 4 and similar to the less-than-significant impacts of the Project.

(b) Operation

As discussed in Section IV.O.3, Utilities and Service Systems—Solid Waste, of this Draft EIR, the Project would result in less-than-significant impacts associated with solid waste during operation. During its operation, Alternative 4 would generate municipal solid waste typical of studio and studio-related uses. Similar to the Project, solid waste generated by Alternative 4 would be recycled or collected by private waste haulers contracted by the Applicant and permitted by the City and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles. The transport of solid waste generated by Alternative 4 to waste management/disposal facilities would continue to occur along existing solid waste routes of travel. As such, as with the Project, Alternative 4 would not result in the need for additional solid waste collection routes to adequately handle waste generated by operations under Alternative 4.

Because this alternative would include the same proposed development program and floor area as the Project, Alternative 4 would generate the same solid waste as the Project. Therefore, it is reasonable to assume that the existing landfills serving the Project Site would have adequate capacity to accommodate the disposal needs of Alternative 4. Since the solid waste generated by Alternative 4 would be the same as that of the Project, Alternative 4 would not result in the need for an additional recycling or disposal facility to adequately handle the waste generated. As such, solid waste impacts during operation of Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

(4) Electric Power, Natural Gas, and Telecommunications Infrastructure

(a) Construction

As discussed in Section IV.O.3, Utilities and Service Systems—Electric Power, Natural Gas, and Telecommunications Infrastructure, of this Draft EIR, the Project would result in less-than-significant impacts associated with energy use during construction. Similar to the Project, construction activities associated with Alternative 4 would consume electricity (construction activities do not typically involve the consumption of natural gas or use of hard-wired telecommunications facilities). The energy consumed during construction of Alternative 4 would be less than under the Project due to the approximately 68 percent reduction in soil export. Like the Project, Alternative 4 would be required to coordinate energy infrastructure improvements with LADWP and SoCalGas and develop on-site energy infrastructure and connections to the existing off--site energy infrastructure in accordance with applicable regulatory requirements. Accordingly, like the Project, construction activities under Alternative 4 would not result in an increase in energy demand that exceeds available distribution infrastructure capabilities that would require the construction of new or expanded energy facilities, the construction of which could cause significant environmental effects. Therefore, impacts on electricity, natural gas and telecommunications infrastructure

associated with short-term construction activities under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project due to the reduction in grading and earthwork.

(b) Operation

As discussed in Section IV.O.3, Utilities and Service Systems—Electric Power, Natural Gas, and Telecommunications Infrastructure, of this Draft EIR, the Project would result in less-than-significant impacts associated with energy use during operation. As with the Project, operation of Alternative 4 would increase the demand for electricity, natural gas, and telecommunications relative to existing conditions. Even though Alternative 4 would result in the same overall floor area as the Project, this alternative would result in slightly less energy demand associated with mechanical ventilation, which would not be required for the above-ground parking structures. All other operations would generate the same energy demands as the Project. Notwithstanding, Alternative 4 would result in similar operational impacts on energy infrastructure and telecommunications when compared to the Project. Also, as discussed in the Utility Report, LADWP and SoCalGas have confirmed that the existing energy infrastructure in the area is sufficient to serve the Project. Additionally, as it relates to natural gas, like the Project, Alternative 4 would comply with the City's all-electric buildings ordinance (Ordinance No. 187,714). Because Alternative 4 would result in less operational energy demand than the Project, the existing energy infrastructure in the area would also be adequate to serve Alternative 4. Similarly, private telecommunications providers would be expected to expand service capacities as needed to meet demand. Therefore, as with the Project, Alternative 4 operation would not result in an increase in energy or telecommunications demand that exceeds available distribution infrastructure capabilities that would require the construction of new or expanded facilities, the construction of which could cause significant environmental effects. Impacts on energy and telecommunications infrastructure under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

3. Comparison of Impacts

Based on the analysis provided above, Alternative 4 would not avoid the Project's significant and unavoidable Project-level and cumulative impacts with respect to regional emissions of NO_X during construction; however, such impacts would be less than those of the Project due to the reduction in the cut/export of soils under Alternative 4. In addition, with the reduction in the export of soils under Alternative 4, this alternative would reduce, but not eliminate, the Project's significant and unavoidable regional NO_X impacts associated with potential concurrent construction and operational activities.

With regard to construction noise and vibration, Alternative 4 would reduce the Project-level and cumulative impacts associated with off-site noise during construction.

However, impacts would remain significant and unavoidable. Construction-related impacts associated with on-site construction and on- (Project-level and cumulative) and off-site (Project-level) vibration related to human annoyance would be similar to the Project and would continue to be significant and unavoidable.

Alternative 4 would reduce some of the Project's impacts that would be less than significant after mitigation, including the following: localized emissions (construction), archaeological resources, paleontological resources, hazards and hazardous materials (construction), and tribal cultural resources.

Alternative 4 would result in greater impacts than the Project associated with aesthetics (scenic vistas, conflicts with plans, and light and glare [operation]), but like as with the Project, impacts would be less than significant.

Alternative 4 would result in similar impacts associated with the following environmental topics, where the Project's impacts were concluded to be less than significant after mitigation: biological resources (special status species and conflicts with plans) and historical resources.

In addition, Alternative 4 would result in similar less-than-significant impacts as the Project with regard to light and glare (construction); regional and localized emissions (operation); TACs (operation); biological resources (riparian habitat or other sensitive natural community, protected wetlands, and wildlife movement); energy; geologic hazards; GHG emissions (operation); hazards and hazardous materials (operation); surface water quality and hydrology (operation); groundwater quality and hydrology (operation); land use and planning; noise (operation); on-site and off-site vibration (based on the significance threshold for building damage) (construction); vibration (operation); fire protection and police protection (operation); transportation; water supply and infrastructure (operation); wastewater; solid waste; and electric power, natural gas, and telecommunications infrastructure.

Alternative 4 would result in less-than-significant impacts related to TACs (construction); human remains; GHG emissions (construction); surface water quality and hydrology (construction); groundwater quality and hydrology (construction); fire protection and police protection (construction); water supply and infrastructure (construction); and electric power, natural gas, and telecommunications infrastructure (construction), that would be less when compared to the Project's less-than-significant impacts.

4. Relationship of the Alternative to Project Objectives

The development program and floor area under Alternative 4 would be the same as the Project, and the site plan and off-site improvements would be similar to that of the Project. Therefore, Alternative 4 would still meet the underlying purpose of the Project, which is to maintain Radford Studio Center as a studio and to modernize and enhance production facilities within the Project Site to accommodate both the existing unmet and anticipated future demands of the entertainment industry, keep production activities and jobs in Los Angeles, upgrade utility and technology infrastructure, and create a cohesive studio lot. However, due to the elimination of below-grade parking and subsequent relocation to at-grade or above-grade parking structures, operational inefficiencies are increased, and compatibility with neighboring uses is reduced. New operational challenges are introduced when sound stages are not located at the same level as adjacent vehicle circulation. Elevating stages over parking uses would necessitate the inclusion of high-capacity oversized lifts to move equipment, sets, and props between grade level and stage level and/or require sloped ramps to all allow vehicles to drive from grade level to stage level to load and unload production elements. Additionally, the area directly adjacent to the stage, the loading area, would be entirely eliminated, further hindering operational efficiency. Alternative 4, as proposed, would also introduce podium-style buildings, with parking uses located below production office and general office uses. The introduction of parking between the production and/or general office use creates a physical disconnect between users of those uses and the primary production level where the sound stages are located, creating operational inefficiency and a lesser-quality design experience for the pedestrian. Additionally, the introduction of parking as a podium use increases overall building heights, which reduce compatibility with neighboring uses.

Regarding the Project objectives, Alternative 4 would meet the following Project objectives as effectively as the Project:

- Ensure the Project Site retains existing studio uses and provide an expandable and flexible production platform, including sound stages, production support, and office space regulated through the establishment of a Specific Plan to respond to evolving market demands and studio production needs while ensuring compatibility with applicable local and regional plans, specifically the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan.

- Establish clear guidelines to preserve historic elements of the studio while modernizing and expanding the studio to ensure its continued operational success in the future.

- Grow the local and regional economy by providing a wide range of entertainment and media-related jobs and keeping production jobs in Los Angeles.

- Provide multi-modal transportation solutions, including Project Mobility Hubs with services that are integrated with public transit lines and encourage alternative means of transportation and mobility.

- Create a model of sustainability in modern production studio development and operations by committing to an all-electric development, and integrating best management practices with regard to water, energy, and resource conservation.

Alternative 4 would partially meet the following Project objective or would not meet the objective as well as the Project:

- Optimize the currently underutilized Project Site to accommodate the existing unmet and anticipated future demands of the entertainment industry by providing new, state-of-the-art sound stages, production support facilities, production offices, and general offices, and upgraded on-site elements such as circulation, staging, basecamp, outdoor production and parking areas, while remedying past haphazard building additions and prioritizing efficient production operations.

- Enhance access through the provision of multiple safe, secure, and efficient entry points to the Project Site. Additionally, ensure the Project is consistent with the intent of the Los Angeles River Revitalization Master Plan, provides an enhanced public right-of-way to promote walkability, strengthens bicycle access, and fosters safety and connectivity in the local community.

- Enhance the identity of the Project Site as an iconic entertainment and media center by providing an architecturally distinct design and a creative signage program that reflects and complements the production, media, and entertainment uses on-site.

- Create an integrated studio campus that is capable of addressing the evolving demands of the media and entertainment industry, incorporates a mix of compatible land uses, and ensures the Project is compatible with the immediate neighborhood by concentrating building heights away from Project Site edges.

V. Alternatives

E. Alternative 5: Residential Mixed-Use Alternative

1. Description of the Alternative

Alternative 5, the Residential Mixed-Use Alternative, includes a combination of studio-related, residential, and retail uses, as well as reduced grading. Alternative 5 would include the construction of 1,981,010 square feet of new development (compared to 1,667,010 square feet under the Project) and, as with the Project, the demolition of 646,120 square feet of existing studio-related uses and the retention of 532,990 square feet of existing studio-related uses, resulting in a net increase of 1,334,890 square feet of floor area (compared to 1,020,890 square feet under the Project). Upon completion, Alternative 5 would provide a total of 2,514,000 square feet of development, resulting in an FAR of approximately 1.29:1. Total development upon completion would be comprised of 750,000 square feet of residential uses (743 units), 379,000 square feet of sound stage uses, 300,000 square feet of production support uses, 575,000 square feet of production office uses, 450,000 square feet of general office uses, and 60,000 square feet of retail uses. As shown in Figure V-4 on page V-160, the maximum permitted building height would be 150 feet compared to 135 feet with the Project and the maximum proposed building height would be 135 feet, which is the same as the Project.

Alternative 5 would include a Specific Plan and Sign District similar to those of the Project, and height zones would be established. However, as noted above, the maximum permitted building height would be increased up to 150 feet within the South Lot.

With regard to parking, approximately 5,485 parking spaces would be provided within at-grade, above-ground, and subterranean parking areas within the South Lot which would be proportionately reduced (i.e., approximately nine percent). As with the Project, basecamp and outdoor production areas would be permitted throughout the Project Site; however, the square footage of outdoor basecamps and outdoor production areas would be reduced relative to existing conditions. Alternative 5 would also include the Project's Mobility Hubs and the same frontage areas, building stepbacks, general landscape plan, and streetscape improvements as the Project. In addition, similar to the Project, Alternative 5 would: (1) include off-site improvements, consisting of the Radford Bridge, Class IV bikeway, and utility improvements; (2) would be designed to meet LEED Gold or equivalent green building standards with rooftop solar panels provided on-site; and (3) request approval of a Specific Plan and Sign District.

LEGEND

- PROJECT PROPERTY LINE
- SOUND STAGES
- PRODUCTION SUPPORT
- PRODUCTION OFFICE
- CREATIVE OFFICE
- RETAIL
- RESIDENTIAL
- PARKING
- EXISTING BUILDING

LAND USE SUMMARY

- 2,514,000 Total square feet
- 1,981,010 sf of new studio-related uses
- 532,990 sf of existing studio-related uses
- Total of approximately 5,485 parking spaces
- Total 1.29:1 FAR
- Maximum permitted height: 150 feet

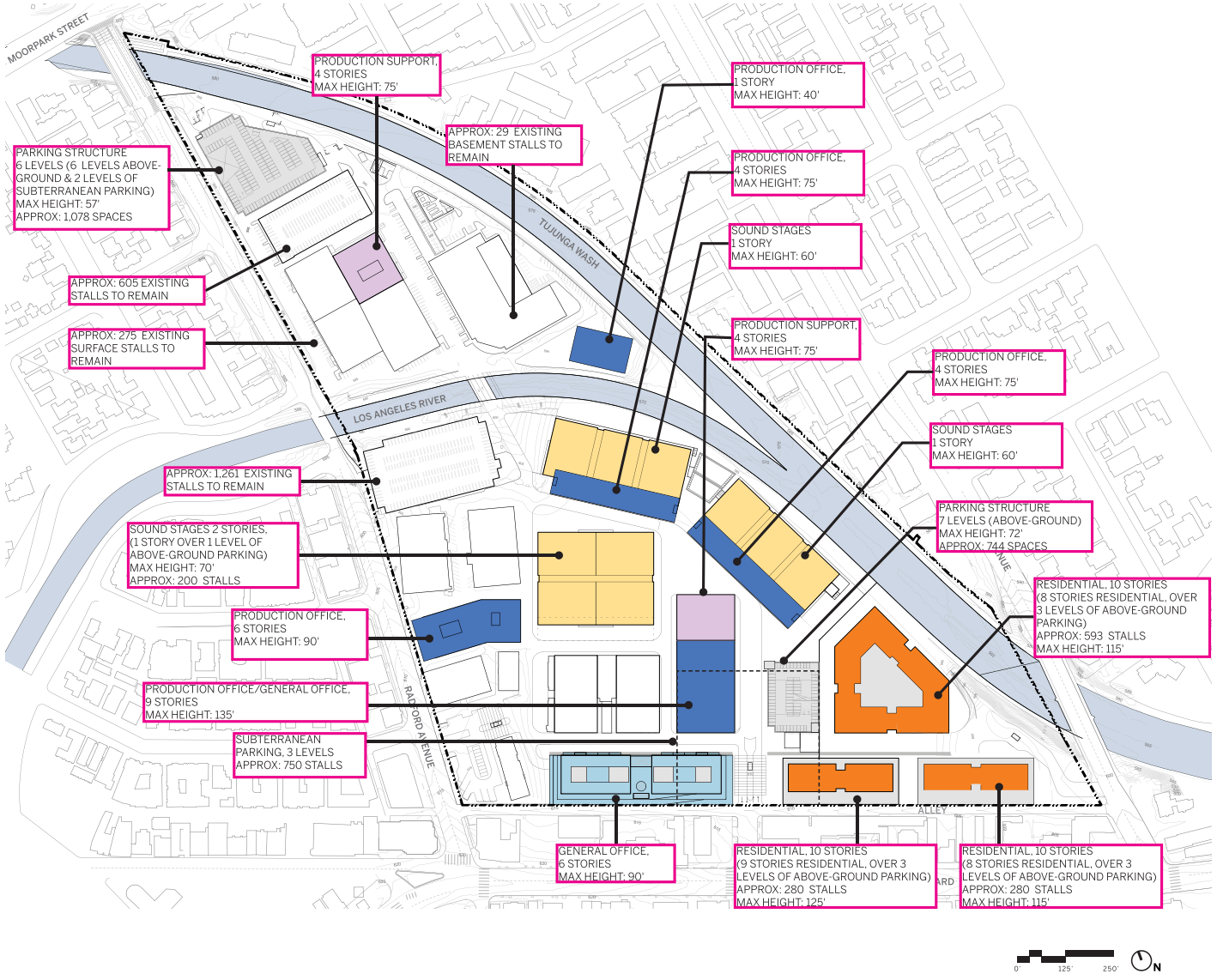

Figure V-4
Alternative 5 Site Plan

Source: Skidmore, Owings & Merrill, 2024.

Since Alternative 5 involves more floor area than the Project due to the introduction of residential uses, there would be a corresponding increase in overall construction activity, associated equipment. However, the duration of construction under Alternative 5 would be similar to the Project and the peak level of daily activity would also be similar to that under the Project. Excavation for the proposed below-grade parking under Alternative 5 would extend to a maximum estimated depth of 50 feet, similar to the Project. Alternative 5 would result in a reduction in the amount of export compared to the Project. Specifically, Alternative 5 would include approximately 605,000 cubic yards of cut, and approximately 55,000 cubic yards of fill, resulting in approximately 550,000 cubic yards of export. As with the Project, this analysis assumes that buildout may occur in one phase over a 39-month timeline, with completion as early as 2028, or that a long-term buildout could occur with completion in 2045.

2. Environmental Impacts

a. Aesthetics

The Project is an employment center project located in a TPA pursuant to PRC Section 21099 as modified by AB 2553. As such, its aesthetic impacts are less than significant as a matter of law. The analysis of aesthetics impacts in Section IV.A of this Draft EIR and in the analysis of the alternatives is therefore provided for informational purposes only.

(1) Scenic Vistas

As described in Section IV.A, Aesthetics, of this Draft EIR, the Project Site is visible from several locations to the south of the Project Site within the Santa Monica Mountains, and the degree of visibility is highly dependent on the distance of the viewpoint from the Project Site, as well as intervening topography. As described above, Alternative 5 would involve the development of studio-related, residential, and retail uses. The maximum building height would be 135 feet which is the same the Project. As with the Project, while Alternative 5 would result in some changes in the visual appearance of the Project Site and would be visible to varying degrees from the scenic viewpoints in the vicinity of the Project Site, Alternative 5 would not substantially reduce or block existing views of scenic resources available from these viewpoints or reduce the field of view of the scenic vistas available from these viewpoints. Therefore, as with the Project, Alternative 5 would not have a substantial adverse effects on scenic vistas. As such, impacts to scenic vistas would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Conflict with Applicable Regulations Governing Scenic Quality

As discussed in Section IV.A, Aesthetics, of this Draft EIR, a number of existing City plans and regulations governing scenic quality are applicable to the Project Site,

including the City's General Plan (i.e., the Framework Element, Conservation Elements and the Community Plan), the RIO, the LAMC, and the Citywide Design Guidelines. As demonstrated in the analysis in Section IV.A, Aesthetics, of this Draft EIR, overall, the Project would not conflict with these regulations. Since Alternative 5 would be developed within the same Project Site as the Project, these same plans and applicable goals, objectives, and policies would be applicable to Alternative 5.

As discussed above, Alternative 5 would involve the combination of studio-related, residential, and retail uses. The proposed uses would be compatible with the general characteristics of the surrounding neighborhood and would be designed consistent with applicable plans related to scenic quality, including promoting pedestrian activity and further activating the streets in the vicinity of the Project Site. As with the Project, Alternative 5 would provide height subareas, setbacks, and stepbacks from the existing adjacent development. Overall, as with the Project, Alternative 5 also would not conflict with the zoning and other regulations governing scenic quality detailed in Section IV.A, Aesthetics, of this Draft EIR. Therefore, the impacts of Alternative 5 related to potential conflicts with the zoning and other regulations governing scenic quality would be less than significant and similar to the less-than-significant impacts of the Project.

(3) Light and Glare

(a) Construction

As with the Project, while the majority of construction under Alternative 5 would occur during daylight hours, construction activities could potentially occur in the evening hours and require the use of artificial lighting. As with the Project, to the extent Alternative 5 requires evening construction and includes artificial light sources, such use would be temporary and would cease upon completion of construction in a given area of the Project Site. As with the Project, any glare generated within the Project Site during construction of Alternative 5 would be highly transitory and short-term given the movement of construction equipment and materials within the construction area. In addition, as with the Project, Alternative 5 would include Project Design Features AES-PDF-1 and AES-PDF-2 that would require the erection of a 10-foot-tall, opaque construction fence around construction sites that are visible from the adjacent public streets, Los Angeles River, and Tujunga Wash, as week as require that construction lighting be directed away from residential properties and the public right-of-way. Therefore, as with the Project, construction activities under Alternative 5 would not create a new source of substantial light or glare or adversely affect daytime or nighttime views in the area. Impacts would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, Alternative 5 would potentially increase light levels within the Project Site and the surrounding area compared to existing conditions through the introduction of new sources of stationary lighting, signage, and landscape lighting. However, the proposed lighting sources under Alternative 5 would be similar to other lighting sources in the Project Site vicinity and would not generate artificial light levels that are out of character with the surrounding area.

As with the Project, future stationary lighting for Alternative 5 would be regulated by the lighting requirements of the proposed Specific Plan, which are incorporated as Project Design Features AES-PDF-3 through AES-PDF-19 in Section IV.A, Aesthetics, of this Draft EIR. These project design features would limit the light from stationary lighting at adjacent sensitive use properties by defining performance requirements that limit light trespass onto an adjacent property with a sensitive use. These project design features also define requirements that would ensure all exterior stationary lighting sources would not be visible from adjacent sensitive use properties and would not present a new source of glare. With implementation of the project design features, illumination from stationary exterior lighting and signage would be less than 2 and 3 fc, respectively, and, thus, would be less than significant under Alternative 5. The project design features would also ensure that signage does not result in high contrast or glare. In addition, as with the Project, with a reduction in basecamp and outdoor production areas compared with existing conditions, light and glare impacts associated with these continued uses would also be less than significant under Alternative 5. Overall, potential light and glare impacts under Alternative 5 would be less than significant but would be greater than the Project's less-than-significant impacts due to the increase in building density and associated lighting.

b. Air Quality

(1) Conflicts with Plans

As discussed further below, like the Project, Alternative 5 would result in potentially significant localized air quality emissions which would conflict with the AQMP. However, as with the Project, these impacts would be mitigated to a less than significant level with the incorporation of Mitigation Measures AIR-MM-1 and AIR-MM-2. These emissions would be further reduced with the inclusion of Mitigation Measures AIR-MM-3 and AIR-MM-4. With respect to operation, as with the Project, Alternative 5 represents infill development located in close proximity to existing transit lines and would utilize existing infrastructure to serve the proposed uses. As such, like the Project, Alternative 5 would advance regional goals to reduce VMT through infill development near transit that would reduce air pollutant emissions compared to an average regional project. Alternative 5 would similarly result in less than significant localized operational impacts. Impacts would be similar to the Project, which are less than significant with mitigation.

(2) Construction Emissions

(a) Regional and Localized Air Quality Impacts

As with the Project, construction of Alternative 5 has the potential to create air quality impacts through the use of heavy-duty construction equipment and vehicle trips generated by construction workers and haul trucks traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.B, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Under Alternative 5, the overall amount of new construction would be greater in comparison to the Project (1,981,010 square feet of new development under Alternative 5 compared to 1,667,010 square feet of new development under the Project, which equates to an approximately 19-percent increase in new development under Alternative 5). This increase is associated with the addition of 743 dwelling units (approximately 750,000 square feet of residential uses), while new development of sound stages, production support, and office space would be reduced as compared to the Project. However, construction of Alternative 5 would require approximately 37 percent less export of soil during grading activities. Specifically, Alternative 5 would result in approximately 605,000 cubic yards of cut (compared to 935,000 cubic yards under the Project) and approximately 55,000 cubic yards of fill (same as under the Project), resulting in approximately 550,000 cubic yards of net export (compared to 880,000 cubic yards under the Project). As maximum daily conditions are used for measuring impact significance, regional air emissions and associated air quality impacts on these days would be similar to the Project and would be significant and unavoidable. As with the Project, Alternative 5 would implement the same mitigation measures (see Mitigation Measures AIR-MM-1 through AIR-MM-4, set forth in Section IV.B, Air Quality, of this Draft EIR) in order to reduce regional NO_X impacts. However, as with the Project, implementation of mitigation measures would not reduce regional NO_X impacts to a less-than-significant level. Therefore, impacts associated with regional construction emissions under Alternative 5 would remain significant and unavoidable and would biosimilar than the impacts of the Project due to the reduction in grading and haul truck trips.

With regard to localized air quality impacts, construction activities under Alternative 5 would be located at similar distances from sensitive receptors as under the Project. Since air emissions and fugitive dust from these construction activities would be similar to those of the Project on maximum construction activity days, localized emissions under Alternative 5 would also be similar to those of the Project, although the duration of such impacts would be reduced due to the reduction in the import/export of soil during grading activities. Therefore, as with the Project, localized impacts under Alternative 5 would be less than significant after mitigation and similar to the less-than-significant-with-mitigation impacts of the Project.

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 5 would generate DPM emissions associated with heavy equipment operations during grading and excavation activities. These activities would represent the greatest potential for TAC emissions. As discussed in Section IV.B, Air Quality, of this Draft EIR, the Project would result in less-than-significant construction impacts with regard to TAC emissions. As previously described above, construction emissions generated by Alternative 5 would be less than the Project due to the decrease in daily haul truck trips. Thus, as with the Project, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 5 would be less than significant but would be less when compared to the Project's less-than-significant impacts due to the reduction in haul truck activity.

(3) Operational Emissions

(a) Regional and Localized Air Quality Impacts

Similar to the Project, operational regional air emissions under Alternative 5 would be generated by vehicle trips to the Project Site and the consumption of natural gas. As discussed in the Alternatives Transportation Memorandum provided in Appendix R.1 of this Draft EIR, development of Alternative 5 would result in an estimated 20,433 daily vehicle trips when compared to approximately 16,435 daily vehicle trips under the Project, resulting in a corresponding approximately 24-percent increase in total daily VMT compared to the Project (136,045 total daily VMT under Alternative 5 compared to 109,996 total daily VMT under the Project).[20] As vehicular emissions are based on the number of trips and VMT, vehicular sources would result in a greater increase in air emissions compared to the Project. In addition, because the overall floor area would be substantially increased when compared to the Project (1,981,010 square feet of new development under Alternative 5 and 1,667,010 square feet of new development under the Project, which equates to an approximately 19-percent increase in floor area under Alternative 5), the demand for electricity and natural gas would be more than under the Project. Further, with the incorporation of the residential buildings, Alternative 5 would result in a substantial increase in VOC emissions from consumer products and vehicle emissions. Therefore, regional operational emissions of VOC under Alternative 5 would result in new significant and unavoidable air quality impacts that would not occur under the Project.[21] As such, impacts associated with regional operational VOC emissions under Alternative 5 would be significant and unavoidable and greater than the Project's less-than-significant impacts.

[20] *See Appendix R.1 of this Draft EIR for VMT Calculator Outputs for Alternatives.*

[21] *Please refer to Appendix R.2 of this Draft EIR.*

With regard to on-site localized area source and stationary source emissions, as with the Project, Alternative 5 would not introduce any major new sources of air pollution within the Project Site. Therefore, similar to the Project, localized impacts from on-site emission sources under Alternative 5 would also be less than significant. However, such impacts would be greater than those of the Project due to the overall increase in net new building square footage.

Localized mobile source operational impacts are determined mainly by peak-hour intersection traffic volumes. As discussed above, Alternative 5 would result in an increase in daily vehicle trips when compared to the Project. Per the SCAQMD's AQMP methodology, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis. As discussed in Section IV.B, Air Quality, of this Draft EIR, approximately 83,000 trips would occur at the Laurel Canyon and Moorpark Street intersection with the Project. During operation of Alternative 5, the number of daily trips would be increased by approximately 24 percent in comparison to the Project, resulting in approximately 103,000 daily trips at the Laurel Canyon and Moorpark Street intersection, which is substantially below the daily traffic volumes expected to generate CO exceedances as evaluated in the 2003 AQMP.[22] As with the Project, Alternative 5 would result in a less-than-significant impacts related to localized mobile source emissions. However, as the daily trips at this intersection would increase slightly in comparison to the Project, impacts under Alternative 5 would be greater than the Project's less-than-significant impacts.

(b) Toxic Air Contaminants

As discussed in Section IV.B, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include DPM from delivery trucks. As this alternative would be greater in size than the Project, the number of delivery trucks would likely increase in comparison to the Project. Nonetheless, as with the Project, the types of uses proposed under Alternative 5 are not considered land uses that generate substantial TAC emissions. As with the Project, typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not proposed under Alternative 5. Similar to the Project, Alternative 5 would not release substantial amounts of TACs and would be consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Thus, potential TAC impacts under Alternative 5 would be less than significant. However, such impacts would be greater than the Project's less-than-significant impacts due to the increase in vehicle trips and floor area.

[22] *The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day.*

(4) Concurrent Construction and Operation

In the event of a long-term buildout scenario, as with the Project, portions of the Project Site under Alternative 5 could be completed and occupied while construction of other Project components occurs. The intensity of this interim year air quality impact would remain similar to the Project under Alternative 2 since the intensity of construction activity (i.e., the pace at which construction occurs and the equipment used on a daily basis) and the balance of completed and occupied components would be similar. However, the square footage and the number of daily trips under Alternative 5 would be greater in comparison to the Project, resulting in increased VOC emissions from architectural coating (painting) activities and vehicle emissions. Under Alternative 5, concurrent construction and operational VOC emissions would exceed SCAQMD regional thresholds, resulting in a significant and unavoidable impact as compared to the Project's less-than-significant impact after mitigation. As with the Project, concurrent construction and operational NO_X emissions would also exceed SCAQMD regional thresholds, resulting in a significant and unavoidable impact. Therefore, concurrent construction and operational regional air quality impacts under Alternative 5 are expected to be significant and unavoidable (related to the emissions of VOC and NO_X), and greater when compared to the Project's significant and unavoidable impact (related to the emission of NO_X only) since the overall amount of construction and operation would be increased under this alternative.

c. Biological Resources

(1) Special Status Species

As discussed in Section IV.C, Biological Resources, of this Draft EIR, there is no special status vegetation within the Project Site and impacts with regard to special status vegetation would be less than significant.

With regard to special status wildlife, two special status wildlife species, the big free-tailed bat and the western mastiff bat, and one species of local concern, the California towhee, have the potential to forage and/or roost within the Project Site. As discussed in Section IV.C, Biological Resources, of this Draft EIR, although habitat conditions on the Project Site are not ideal due to the level of disturbance in general and minimal availability of open space, there is a moderate likelihood for both bat species to forage and/or roost throughout the Project Site. While temporary loss of habitat is not likely to affect regional populations of these two bat species, construction activities, such as building demolition, tree removal, and demolition of other structures on the Project Site, may result in direct mortality of bats or untimely abandonment of a roost. As such, impacts on these species would be potentially significant.

Due to the abundance of California towhee throughout the region, the low likelihood for direct mortality due to species mobility, and the extremely minimal loss of suitable habitat, impacts on this species would be less than significant.

Although Alternative 5 would result in an increase in new floor area (i.e., 1,981,010 square feet compared to 1,667,010 square feet with the Project) and the same amount of demolition as the Project (i.e., 646,120 square feet), this alternative would require less grading and excavation activities due to the reduction in the amount of subterranean parking within the South Lot. As such, potential impacts to special status wildlife species found within the Project Site would be less than the Project since Alternative 5 would result in the removal of fewer trees Alternative 5 would incorporate the same mitigation measure as the Project (i.e., Mitigation Measures BIO-MM-1) to reduce potential impacts related to special-status wildlife species. Therefore, as with the Project, Alternative 5 would result in less-than-significant impacts after mitigation with respect to impacts to candidate, sensitive, or special status species. Due to the reduced grading, such impacts would be less when compared to the Project's less-than-significant impacts after mitigation.

(2) Protected Wetlands

As discussed in Section IV.C, Biological Resources, of this Draft EIR, there are no federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) as defined by Section 404 of the Clean Water Act within or adjacent to the Project Site. Therefore, similar to the Project, no impacts with respect to protected wetlands would occur under Alternative 5.

However, there are two jurisdictional features, which are regulated by the USACE, RWQCB, and CDFW, that pass through the Project Site—the Los Angeles River and Tujunga Wash. Similar to the Project, the Applicant would consult with these agencies and prepare and process the required permits associated with construction of Alternative 5. As such, as with the Project, through compliance with applicable regulatory requirements, Alternative 5 would result in less-than-significant impacts on jurisdictional features, and such impacts would be similar when compared to the less-than-significant impacts of the Project.

(3) Wildlife Movement

As with the Project, development under Alternative 5 would not occur within or adjacent to a recognized regional wildlife corridor as none currently exist within or adjacent to the Project Site. As with the Project, development under Alternative 5 would involve clearing portions of the Project Site, including removal of certain buildings, landscaping, and trees, which could potentially be used by nesting birds. However, this impact would be reduced when compared to the Project as this alternative would involve less demolition and grading when compared with the Project. In addition, as with the Project, Alternative 5 would

implement Project Design Feature BIO-PDF-2, which would ensure that the Project would not interfere substantially with the movement of any migratory birds that may nest in the trees within and surrounding the Project Site. Overall, Alternative 5 would result in less-than-significant impacts with respect to wildlife movement, and such impacts would be less when compared to the Project's less-than-significant impacts due to the reduction in demolition and grading.

(4) Conflict with Local Policies Protecting Biological Resources

As discussed in Section IV.C, Biological Resources, of this Draft EIR, a number of existing City policies or ordinances, including the City's General Plan (i.e., the Framework Element, Conservation Element, Open Space Element, and the Community Plan), the City's Tree Protection Ordinance, the City's RIO District Ordinance landscaping requirements, the City's LARRMP, and the County's Landscaping Guidelines, protecting biological resources are applicable to the Project Site. As with the Project, since Alternative 5 would be developed within the same Project Site as the Project, these same policies and ordinances would be applicable to Alternative 5. As detailed in Section IV.C, Biological Resources, of this Draft EIR, the Project would generally not conflict with the policies applicable to the Project Site, except for the potential to impact protected trees, which could potentially conflict with the City's Tree Protection Ordinance. However, with implementation of mitigation that addresses the protection of trees during construction, impacts would be reduced to less than significant. As with the Project, Alternative 5 would implement Mitigation Measure BIO-MM-2 as set forth in Section IV.C, Biological Resources, of this Draft EIR, which would reduce potential impacts related to conflicts with local policies or ordinances protecting biological resources to less-than-significant levels. Therefore, as with the Project, Alternative 5 would not conflict with local policies or ordinances protecting biological resources (trees), and such impacts would be less than significant. With the reduction in demolition and grading requiring the removal of fewer trees compared to the Project, such impacts would be less when compared to the Project's less-than-significant impacts after mitigation.

d. Cultural Resources

(1) Historical Resources

As discussed in Section IV.D, Cultural Resources, of this Draft EIR, the Project Site includes three potentially historic structures (i.e., the Mill Building, the Administration Building, and Stage 2), as well as the potential Mack Sennett Historic District. As illustrated in Figure 5 in the Historical Resources Report, included in Appendix F.1 of this Draft EIR, these potential historic resources are all located on the South Lot. As discussed in Section IV.D, Cultural Resources, of this Draft EIR, Project impacts to these historical resources would be less than significant after mitigation.

As with the Project, Alternative 5 would remove five buildings within the boundary of the potential Mack Sennett Historic District, two of which have been identified as contributors. Although the buildings are representative of support functions, characteristic of independent motion picture studios during the Major Studio Era, the buildings are not critical to understanding the historic significance of the Potential Mack Sennett Historic District, and the Historic District would still convey its significance despite their removal. Thus, similar to the Project, potential impacts associated with the removal of contributing buildings would be less than significant.

As with the Project, Alternative 5 would involve the relocation and rehabilitation of the Arts/HR Building, a contributor to the Potential Mack Sennett Historic District. Alternative 5 would also rehabilitate the Mack Sennett Building, the Administration Building, and Stage 2 and relocate and rehabilitate the Mill Building. Alternative 5 would implement the same mitigation measures as the Project (see Mitigation Measures CUL-MM-1 through CUL-MM-20, as set forth in Section IV.D, Cultural Resources, of this Draft EIR) to reduce potential impacts from the relocation and rehabilitation of historic buildings. Similar to the Project, potential impacts associated with relocation and rehabilitation of these buildings would be reduced to less-than-significant levels after mitigation under Alternative 5.

With respect to new construction, Alternative 5 would involve an increase in the Project's proposed floor area within the same general site plan. As with the Project, new development as part of Alternative 5 would not materially impair the significance of any historical resources located on the Project Site. Thus, similar to the Project, the potential impact from new construction would be less than significant.

Overall, similar to the Project, potential impacts to historical resources under Alternative 5 would be less than significant after mitigation.

(2) Archaeological Resources

As detailed in Section IV.D, Cultural Resources, of this Draft EIR, the SCCIC records search did not identify any known archaeological resources within the Project Site. However, the geoarchaeological investigation conducted as part of the Archaeological Resources Assessment, included as Appendix F.2 of this Draft EIR, indicates that, while no artifacts were found, the Project Site may contain historical-period and prehistoric archaeological deposits. As such, there is high sensitivity for buried archaeological resources within the Project Site. As discussed in Section IV.D, Cultural Resources, of this Draft EIR, the Project's impacts on archaeological resources were concluded to be less than significant after mitigation(see Mitigation Measures CUL-MM-21 through CUL-MM-22).

As previously discussed, as with the Project, excavation under Alternative 5 would extend up to a depth of approximately 50 feet. However, Alternative 5 would involve

approximately 605,000 cubic yards of cut compared to the approximately 935,000 cubic yards under the Project. Nonetheless, it is possible that excavation activities associated with Alternative 5 would also involve intact native sediment that may contain archaeological deposits. Alternative 5 would comply with the same regulatory requirements and implement the same mitigation measures as the Project. As such, as with the Project, potential impacts to archaeological resources would be less than significant after mitigation under Alternative 4, but such impacts would be less when compared to the Project's less-than-significant impacts after mitigation due to the reduced excavation footprint and cut activities.

(3) Human Remains

With regard to human remains, no known traditional burial sites have been identified on the Project Site. Section IV.D, Cultural Resources, of this Draft EIR, concludes that through compliance with applicable regulatory requirements, potential impacts to human remains would be less than significant. As Alternative 5 results in reduced cut activities, potential impacts under Alternative 5 would also be less than significant and reduced when compared with those of the Project.

e. Energy

(1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

As with the Project, construction activities associated with Alternative 5 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would increase compared to the Project due to the increase in net new development and overall amount of construction under this alternative. However, as with the Project, construction activities under Alternative 5 would comply with all applicable regulatory requirements relating to energy use. Therefore, as with the Project, short-term energy use during construction of Alternative 5 would not occur in a wasteful, inefficient, or unnecessary manner. Nonetheless, impacts would be greater when compared to the Project's less-than-significant impacts due to the construction of a larger development.

As with the Project, operation of Alternative 5 would generate an increase in the consumption of electricity and petroleum-based fuels compared to existing conditions. Alternative 5 would result in a net reduction in natural gas consumption due to compliance with the All-Electric Buildings Ordinance. Because the overall floor area would be substantially increased when compared to the Project and the proposed land uses would include a more energy-intensive use (i.e., residential dwelling units), the demand for electricity and natural gas would be greater compared to the Project. Alternative 5 would

also include energy saving features, including solar. In terms of petroleum-based fuel usage, daily VMT generated by this alternative would be approximately 24 percent greater in comparison to the Project due to the increase in floor area and inclusion of residential dwelling units. Notwithstanding, as with the Project, Alternative 5 would comply with applicable energy efficiency standards, and new buildings would be developed in accordance with the latest energy efficiency standards. Therefore, as with the Project, long-term energy use during operation of Alternative 5 would not occur in a wasteful, inefficient, or unnecessary manner. Impacts would be less than significant and greater than the less-than-significant impacts of the Project.

(2) Conflict with Plans for Renewable Energy or Energy Efficiency

As discussed above, Alternative 5 would result in increased operational energy demand in comparison to the Project due to the increased floor area and inclusion of more energy-intensive uses under this alternative. Notwithstanding, as with the Project, Alternative 5 would comply with applicable energy efficiency standards, and the development would represent an infill project within an urbanized area that is well-served by public transportation, thus contributing to an energy efficient land use pattern consistent with SCAG's 2024–2050 RTP/SCS growth forecast. Therefore, similar to the Project, Alternative 5 would not conflict with plans or policies regarding renewable energy and energy efficiency, and Alternative 5 would result in less-than-significant impacts.

f. Geology and Soils

(1) Geologic Hazards

The Project Site is located within the seismically active region of Southern California. As discussed in Section IV.F, Geology and Soils, of this Draft EIR, with compliance with applicable regulatory requirements, Project impacts associated with geologic hazards would be less than significant. Under Alternative 5, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, liquefaction, seismically induced settlement, subsidence, and expansive soils, would be similar to those under the Project, particularly since geological hazard impacts are a function of a site's underlying geologic conditions rather than the type of land uses or amount of development proposed Alternative 5 would be developed on the same Project Site as the Project. As with the Project, Alternative 5 would be subject to the same regulations, including the applicable provisions in the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the California Building Code, the City's General Plan Safety Element, and the Los Angeles Building Code. Furthermore, as with the Project, Alternative 5 would be required to demonstrate compliance with the applicable provisions of these safety requirements before permits can be issued for construction. Accordingly, Alternative 5 would comply with all applicable regulatory requirements, including applicable provisions of the Los Angeles

Building Code relating to seismic safety, and accepted and proven construction engineering practices would be implemented, including the geotechnical design recommendations set forth in a development-specific geotechnical investigation and similar to Project Design Feature GEO-PDF-1 included for the Project in Section IV.F, Geology and Soils, of this Draft EIR. Overall, impacts related to geology and soils under Alternative 5 would be less than significant, and such impacts would be similar to the Project's less-than-significant impacts.

(2) Paleontological Resources

As discussed in Section IV.F, Geology and Soils, of this Draft EIR, a records search at the NHMLA did not identify any known paleontological resources within the Project Site. However, as evaluated in the Paleontological Resources Report, included as Appendix H.3 of this Draft EIR, both Pleistocene-age alluvial fan deposits underlying the Project Site and the nearby Modelo Formation have produced significant fossil specimens and are, therefore, assigned a high paleontological potential. As discussed in Section IV.F, Geology and Soils, of this Draft EIR, with implementation of Mitigation Measure GEO-MM-1, potential Project impacts associated with uncovering of paleontological resources would be reduced to less-than-significant levels.

As previously discussed, as with the Project, excavation under Alternative 5 would extend up to approximately 50 feet below the existing ground surface. Therefore, as with the Project, Alternative 5 is likely to encounter sediments with a high paleontological sensitivity. However, this potential would be less when compared to the Project due to the reduced excavation footprint and cut activities under this alternative. Specifically, Alternative 5 would involve approximately 605,000 cubic yards of cut compared to approximately 935,000 cubic yards under the Project. Alternative 5 would also comply with the same regulatory requirements as the Project and would implement the same mitigation as the Project to address potential impacts to paleontological resources. As such, as with the Project, impacts to paleontological resources would be less than significant after mitigation, and such impacts would be less when compared to the Project's less-than-significant impacts after mitigation due to the reduction in cut activities.

g. Greenhouse Gas Emissions

(1) Construction

Under Alternative 5, the overall amount of new construction would increase in comparison to the Project (1,981,010 square feet of new development under Alternative 5 as compared to 1,667,010 square feet of new development under the Project, which equates to an approximately 19-percent increase in new development under Alternative 5). This increase is associated with the development of approximately 750,000 square feet of residential uses, comprising 743 dwelling units. However, under this alternative, the amount

of cut activities and associated haul trucks trips for export would be reduced. With the decrease in grading quantities and increase in building construction activity, total GHG emissions under this alternative would be similar to the Project. As a result, GHG emissions over the construction duration under Alternative 5 would be less than significant, and such impacts would be generally similar to the Project's less-than-significant impacts.

(2) Operation

As discussed in Section IV.G, Greenhouse Gas Emissions, of this Draft EIR, GHG emissions from a development project are determined in large part by the number of daily trips generated and the energy consumption associated with the proposed land uses. As discussed above, Alternative 5 would increase the overall floor area when compared to the Project, and the proposed land uses would include a more energy-intensive use (i.e., residential dwelling units). Thus, the demand for electricity and natural gas under Alternative 5 would be greater than under the Project. In terms of petroleum-based fuel usage, the daily VMT generated by this alternative would be approximately 24 percent greater in comparison to the Project due to the increase in square footage and inclusion of residential dwelling units. Thus, the amount of GHG emissions generated by Alternative 5 would be greater than under the Project.

As with the Project, Alternative 5 would be designed to comply with the applicable provisions of the Los Angeles Green Building Ordinance and would incorporate sustainability features similar to those set forth in the Project to reduce GHG emissions. Specifically, as with the Project, Alternative 5 would be designed to meet LEED Gold or equivalent green building standards, and rooftop solar panels would be provided on-site. Furthermore, as with the Project, Alternative 5 would represent infill development within an urban area that is well-served by public transportation and, thus, would contribute to an energy efficient land use pattern, which would support the goals of the RTP/SCS intended to reduce GHG emissions. Therefore, as with the Project, Alternative 5 would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans, and GHG emissions impacts would be less than significant. However, impacts related to GHG emissions under Alternative 5 would be less than significant but greater when compared to the Project's less-than-significant impacts due to the increase in development.

h. Hazards and Hazardous Materials

(1) Construction

As with the Project, hazardous materials, such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, would be used and, therefore, would require proper handling, management, and, in some cases, disposal. As discussed for the Project in Section IV.H, Hazards and

Hazardous Materials, of this Draft EIR, all potentially hazardous materials required during construction of Alternative 5 would also be handled and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing associated risks. As such, as with the Project, impacts associated with the use of hazardous materials during construction would be less than significant. However, with the increased development proposed under Alternative 5, such impacts would be greater when compared to the Project's less-than-significant impacts.

With regard to potential risk of accident or upset conditions, while Alternative 5 would involve the same types of construction activities as the Project, Alternative 5 would remove fewer structures and would reduce cut activities. As such, the potential to encounter ACMs, LBP, contaminated soil, and contaminated groundwater would be reduced compared to the Project. As with the Project, Alternative 5 would comply with all applicable regulatory requirements related to hazards, and Alternative 5 would implement the same mitigation measure as the Project, requiring a Soil Management Plan and Health and Safety Plan, as well as the same design features (e.g., requiring an updated Spill Prevention, Control, and Countermeasure Plan). Thus, as with the Project, under Alternative 5, potential impacts associated with risk of hazards and emission or handling of hazardous waste within 0.25 miles of a school during construction would be less than significant with mitigation. Such impacts would be less when compared to the Project's less-than-significant impact after mitigation due to the removal of fewer structures and reduced earthwork.

With respect to the Project Site's listing on a hazardous materials site, as discussed in Section IV.H, Hazards and Hazardous Materials, of this Draft EIR, the Project Site is recorded on the "HIST CORTESE" list of sites compiled pursuant to Government Code Section 65962.5 in reference to the LUST file closed by the LARWQCB in January of 1997. This case was associated with USTs damaged during the Northridge Earthquake. The five USTs were removed in 1994 under a permit by the LAFD. Impacted soil was removed for off-site disposal, and groundwater monitoring was required by the LARWQCB in May of 1994. Monitoring of soil vapor and groundwater was conducted, and the LARWQCB closed the LUST file in January of 1997. As set forth in Section IV.H, Hazards and Hazardous Materials, of this Draft EIR, implementation of Mitigation Measure HAZ-MM-1 would reduce any potential impacts associated with this case to a less-than-significant level. As with the Project, Alternative 5 would implement the same mitigation measure. Thus, similar to the Project, potential impacts associated with listing on a hazardous materials site would be less than significant after mitigation.

Overall, similar to the Project, impacts related to hazards and hazardous materials during construction of Alternative 5 would be less than significant after mitigation.

(2) Operation

As with the Project, operation of Alternative 5 would involve the use of limited quantities of potentially hazardous materials typical of those used in studio campuses and residential uses. Specifically, potentially hazardous materials typical of those used on studio campuses include paints, adhesives, fuels, pesticides for landscaping, cleaning and maintenance supplies, materials for pyrotechnic special effects, and other general products related to studio operations. Potentially hazardous materials typical of those used in residential uses include paints, pesticides for landscaping, cleaning and maintenance supplies, and other general products related to residential uses.

Since a reduced amount of studio uses would be developed compared to the Project, Alternative 5 would involve less usage of potentially hazardous materials related to production activities. Notwithstanding, because the overall floor area would be greater than the Project (1,981,010 square feet of new development under Alternative 5 as compared to 1,667,010 square feet of new development under the Project, which equates to an approximately 18-percent increase in new development under Alternative 5), Alternative 5 could involve a greater usage of potentially hazardous materials than the Project overall, specifically with regard to those related to residential uses. However, as with the Project, all hazardous materials on the Project Site under Alternative 5 would be handled, used, stored, and disposed of in accordance with all applicable local, state, and federal regulations. As with the Project, Alternative 5 would include design features requiring the preparation or updating of safety and emergency plans. Such safety and emergency plans would include the Spill Prevention, Control, and Countermeasure Plan, the Radford Studio Center Emergency Action Plan, and the Radford Studio Center IIPP, including the Radford Studio Center Safety Manual. Overall, potential impacts associated with hazardous materials use and the resultant potential risk of upset during operation of Alternative 5 would be less than significant. Such impacts would be greater when compared to the Project's less-than-significant impacts as a result of the overall increase in development and related increase in the use of potentially hazardous materials.

i. Hydrology and Water Quality

(1) Surface Water Quality

(a) Construction

As previously described, Alternative 5 would include more construction activities due to the construction of 1,981,010 square feet of new floor area as compared to 1,667,010 square feet under the Project. However, Alternative 5 would involve less earthwork, with approximately 605,000 cubic yards of cut, and approximately 55,000 cubic yards of fill, resulting in 550,000 cubic yards of export, whereas the Project would include approximately 935,000 cubic yards of cut, and approximately 55,000 cubic yards of fill under

the Project, resulting in approximately 880,000 cubic yards of export. As previously discussed, Alternative 5 would require a maximum excavation depth of approximately 50 feet; therefore, like the Project, construction activities could encounter groundwater, and dewatering may be necessary. Like the Project, in accordance with the requirements of the NPDES Construction General Permit, a SWPPP would be prepared for Alternative 5 which would specify BMPs to be used during construction to manage stormwater and non-stormwater discharges. In addition, in the event dewatering is required, as with the Project, temporary dewatering pumps and filtration would be used during construction of Alternative 5 in compliance with the NPDES permit. These temporary systems would comply with all applicable NPDES requirements related to construction and discharges from dewatering operations, as well as the LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties.

With the implementation of SWPPP and site-specific BMPs, Alternative 5 would reduce or eliminate the discharge of potential pollutants into stormwater runoff. In addition, construction of Alternative 5 would be required to comply with City grading permit regulations, which require the preparation and implementation of necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspections to reduce sedimentation and erosion. Furthermore, Alternative 5 would also be subject to Los Angeles County Flood Control District permit requirements, which prohibit construction within the channel during the rainy season (October 15 to April 15) and require at least 33 percent of the channel be available for flow through with a temporary diversion for the remainder of the year.

Overall, with compliance with NPDES requirements, site-specific BMPs included as part of the SWPPP, and all applicable City and County of Los Angeles regulations, construction of Alternative 5 would not result in discharges that violate any water quality standard or waste discharge requirements or otherwise substantially degrade water quality. Therefore, as with the Project, construction-related impacts to surface water quality under Alternative 5 would be less than significant. Given the increased building construction activity but the reduced earthwork, such impacts would be generally similar to the less-than-significant impacts of the Project.

(b) Operation

As is typical of most urban developments, stormwater runoff from the Project Site has the potential to introduce pollutants such as sediment, nutrients, pesticides, metals, pathogens, oil, and grease into the stormwater system under Alternative 5. Due to the increase in floor area and associated activities on-site, Alternative 5 could generate more of these types of pollutants compared to the Project. However, similar to the Project, Alternative 5 would implement BMPs for managing stormwater runoff in accordance with the City's LID

Ordinance requirements. Due to the incorporation of the LID BMPs, operation of Alternative 5 would not result in discharges that would violate any surface water quality standards or waste discharge requirements, nor would Alternative 5 create substantial additional sources of polluted runoff that could substantially degrade surface water quality. Thus, as with the Project, impacts to surface water quality during operation of Alternative 5 would be less than significant, and such impacts would be greater than the less-than-significant impacts of the Project due to the increase in development.

(2) Groundwater Quality

(a) Construction

Similar to the Project, Alternative 5 could require temporary dewatering during construction. However, the amount of dewatering required could be potentially reduced under Alternative 5 due to the reduction in grading activities. In addition, as with the Project, any dewatering required under Alternative 5 would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit and applicable LARWQCB requirements.

As discussed in Section IV.H, Hazards and Hazardous Materials, of this Draft EIR, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would, therefore, require proper management and, in some cases, disposal. The management of any resultant hazardous wastes that may be encountered could increase the potential for hazardous materials to be released into groundwater if these materials are released while the site soils are exposed. As with the Project, Alternative 5 would comply with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste. With compliance with all applicable regulations, the potential for the construction of Alternative 5 to release contaminants into groundwater that could affect existing contaminants, expand the area of groundwater contamination, or increase the level of contamination would be reduced. In addition, as there are no existing groundwater production wells or public water supply wells within one mile of the Project Site, construction activities would not be anticipated to affect existing wells. Alternative 5 would require more construction activities when compared to the Project due to the increased floor area, which could result in an increased use of hazardous materials. However, grading and excavation activities would be reduced under Alternative 5. Therefore, the impacts to groundwater quality would be anticipated to be similar to those of the Project.

In addition, like the Project, Alternative 5 would have the potential to encounter contaminated soils, which could potentially affect groundwater. However, as with the Project, any contaminated soils found during excavation would be captured within the volume of excavated material and would be removed from the Project Site and remediated at an approved disposal facility in accordance with applicable regulatory requirements. Lastly, as

there are no oil wells on the Project Site, construction activities under Alternative 5 would not disturb existing oil wells which could impact groundwater quality.

Based on the above, overall impacts with respect to groundwater quality during construction under Alternative 5 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(b) Operation

As discussed in Section IV.I, Hydrology and Water Quality, of this Draft EIR, in general, operational activities that could affect groundwater quality include spills of hazardous materials and leaking USTs. As discussed in Section IV.I, Hazards and Hazardous Materials, of this Draft EIR, no USTs are currently operated at the Project Site. Therefore, as with the Project, Alternative 5 would not disturb existing USTs, and Alternative 5 would not introduce any new USTs that would have the potential to expose groundwater to contaminants. In addition, as with the Project, Alternative 5 would incorporate source control measures, including good housekeeping, removal of trash and maintenance of driveways and parking areas, and proper use and storage of pesticides, which would reduce water quality impacts and prevent pollutants from entering the groundwater by percolation within landscaped areas or other permeable surfaces. Overall, as with the Project, impacts with respect to groundwater quality during operation of Alternative 5 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(3) Surface Water Hydrology

(a) Construction

As previously discussed, Alternative 5 would involve reduced grading and excavation. However, overall development would increase relative to the Project. Notwithstanding, as with the Project, construction activities would have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Similar to the Project, Alternative 5 would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, Alternative 5 would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows. In addition, Alternative 5 construction activities would be required to comply with all applicable City grading permit regulations, which require the preparation and implementation of necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspections to reduce sedimentation and erosion. Furthermore, Alternative 5 would also be subject to Los Angeles County Flood Control District permit requirements, which prohibit construction within the channel during the rainy season (October 15 to April 15) and require that at least

33 percent of the channel be available for flow through with a temporary diversion for the remainder of the year. Thus, through compliance with all NPDES Construction General Permit requirements, including the preparation of a SWPPP, implementation of BMPs, as well as compliance with applicable City grading permit regulations, Alternative 5 would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, or flooding on- or off-site. Therefore, construction-related impacts to surface water hydrology under Alternative 5 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(b) Operation

Alternative 5 would include the development of new buildings, paved areas, and landscaped areas. As with the Project, it is anticipated that Alternative 5 would decrease impervious surfaces on the Project Site compared to existing conditions. While Alternative 5 would construct more floor area than the Project, it would also result in additional required open space areas associated with the residential uses. Thus, overall the amount of impervious area would be similar to that of the Project. In addition, with the introduction of new landscaped areas as part of Alternative 5 as well as incorporation of BMPs in accordance with the City's LID requirements, the overall runoff flow volume would decrease compared to existing conditions.

Overall, operation of Alternative 5 would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion, siltation, or on- or off-site flooding would occur. In addition, Alternative 5 would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, operational impacts to surface water hydrology under Alternative 5 would be less than significant and such impacts would be similar to the less-than-significant impacts of the Project.

(4) Groundwater Hydrology

(a) Construction

As previously discussed, as with the Project, Alternative 5 could require a temporary dewatering system during construction, which would occur pursuant to, and comply with, all applicable regulatory requirements. As concluded in Section IV.I, Hydrology and Water Quality, of this Draft EIR, the quantity of groundwater removed via dewatering for the Project would not interfere with any groundwater supply pumping in the vicinity of the Project Site. Furthermore, no water supply wells are located at the Project Site or within one mile of the Project Site that could be impacted by construction. Accordingly, as Alternative 5 would reduce the excavation footprint and cut activities, construction impacts on groundwater hydrology during construction of Alternative 5 would be less than significant. Such impacts

would be less than the less-than-significant impacts of the Project due to the overall reduction in grading and excavation activities.

(b) Operation

As with the Project, it is anticipated that Alternative 5 would decrease impervious surfaces on the Project Site compared to existing conditions. The extent to which existing impervious surfaces would be reduced would be greater than that of the Project since Alternative 5 would include more open space due to the introduction of residential uses. Notwithstanding, as with the Project, Alternative 5 would include the installation of BMPs in accordance with the City's LID requirements in order to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site. As discussed for the Project in Section IV.I, Hydrology and Water Quality, of this Draft EIR, regardless of the BMPs ultimately installed under Alternative 5, a portion of the stormwater would be captured to be infiltrated into the ground while the excess stormwater would bypass the BMP systems and discharge to the Los Angeles River through an existing or proposed piped connection. This excess stormwater would not have the opportunity to discharge or infiltrate into the ground and would thus not affect groundwater hydrology, including the direction of groundwater flow. Therefore, as with the Project, Alternative 5 would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management, and impacts on groundwater hydrology during operation of Alternative 5 would be less than significant. Such impacts would be similar to the less-than-significant impacts of the Project.

j. Land Use and Planning

Alternative 5, the Residential Mixed-Use Alternative, would involve studio-related, residential, and retail uses. Alternative 5 would include the construction of 1,981,010 square feet of new development, the demolition of 646,010 square feet of existing studio-related uses, and the retention of 532,990 square feet of existing studio-related uses. Total development upon completion would be comprised of 750,000 square feet of residential uses (743 units), 379,000 square feet of sound stage uses, 300,000 square feet of production support uses, 575,000 square feet of production office uses, 450,000 square feet of general office uses, and 60,000 square feet of retail uses. Upon completion, Alternative 5 would provide a total of 2,514,000 square feet of development, resulting in an FAR of approximately 1.29:1. This alternative would include similar entitlements as the Project, including a General Plan Amendment, a Vesting Zone Change and Height District Change, adoption of the Radford Studio Center Specific Plan, establishment of a Sign District, and a Development Agreement. To introduce any residential uses to the Project Site, at a minimum an entitlement request including a General Plan Amendment and Zone Change would be required.

As discussed in Section IV.J, Land Use and Planning, of this Draft EIR, the Project was determined to be overall consistent with the applicable plans, policies and regulations adopted for the purpose of avoiding or mitigating an environmental effect, and such impacts were concluded to be less than significant. Alternative 5 includes the same types of uses as the Project, in addition to residential uses. These uses are consistent with existing uses in the Project Site vicinity. Alternative 5 also includes a similar conceptual site plan, but with multi-family residential uses located within the southeast portion of the South Lot. Building heights and floor area would be increased under Alternative 5 when compared with the Project. Like the Project, Alternative 5 also includes on- and off-site improvements including the Radford Bridge, Mobility Hubs and Class IV bikeway. Thus, as with the Project, Alternative 5 would also be generally consistent with the same applicable plans, policies, and regulations that were adopted to avoid or mitigate an environmental effect, including, but not limited to, the City's General Plan Framework Element, the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan, the LAMC, and SCAG's 2024–2050 RTP/SCS. In addition, the housing component of Alternative 5 would help meet the demand for housing called out in recent land use plans such as the Housing Element and 2024–2050 RTP/SCS. Overall, the impacts of Alternative 5 related to potential conflicts with applicable land use plans, policies, or regulations would be less than significant. Such impacts would be greater than those of the Project due to the increase in building heights and density of development. However, like the Project, such impacts would be less than significant.

k. Noise

(1) Noise

(a) Construction

The types of construction activities and associated equipment under Alternative 5 would be substantially similar to the Project, although the overall amount of new construction activities would increase due to the increase in total floor area associated with the introduction of residential uses under Alternative 5. As with the Project, construction of Alternative 5 would generate noise from the use of heavy-duty construction equipment, as well as from haul truck and construction worker trips. Under Alternative 5, the on-site construction activities and the associated construction noise levels would be similar to those of the Project on maximum activity days since the daily intensity of construction activities would be similar to the Project. As such, noise levels associated with the on-site construction during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project.

Alternative 5 would result in a reduced number of truck trips on peak construction days (i.e., 358 trucks versus 448 trucks per day under the Project), due to the reduction in grading. Therefore, noise levels associated with off-site trucks would be reduced under Alternative 5, ranging from 0.5 dBA (L_{eq}) lower along Laurel Canyon Boulevard; 0.6 dBA (L_{eq}) along

Ventura Boulevard; 0.7 dBA (L_{eq}) lower along Moorpark Street and Colfax Avenue; and 0.9 dBA (L_{eq}) lower along Radford Avenue, as compared to the Project. However, the estimated off-site construction noise level along Radford Avenue would still exceed the significance threshold by up to 5.2 dBA (L_{eq}).

Alternative 5 would implement similar mitigation measures as the Project, which would minimize construction noise. Nonetheless, on- and off-site construction noise impacts (both project-level and cumulative) would be significant and unavoidable under Alternative 5, and such impacts would be less than the Project's significant and unavoidable impacts since the off-site construction noise levels would be reduced under Alternative 5.

(b) Operation

As discussed in Section IV.K, Noise, of this Draft EIR, sources of operational noise under the Project would include on-site stationary noise sources, including mechanical equipment, outdoor studio production activities (outdoor production and basecamp), parking facilities, loading docks and trash compactors, and off-site mobile (roadway traffic) noise sources. Alternative 5 would introduce similar noise sources as the Project as well as noise associated with residential uses in an urban area. It is anticipated that the noise levels from building mechanical equipment, outdoor studio production activities, parking facilities, and loading docks and trash compactors would be similar to the Project, based on the same total floor area. Alternative 5 would implement the same project design features as the Project, which would minimize on-site operational noise. Accordingly, operational on-site noise impacts under Alternative 5 would be less than significant and similar when compared to the less-than-significant impacts of the Project.

With regard to operational off-site (traffic) noise, Alternative 5 would generate a greater net increase in operational traffic than the Project due to the addition of residential uses (i.e., a net increase of 13,635 daily trips under Alternative 5 versus 9,198 daily trips under the Project).[23] This net increase in vehicle trips would result in an increase in off-site operational traffic-related noise levels under Alternative 5. Specifically, the estimated off-site traffic noise under Alternative 5 would result in a maximum noise increase of 4.8 dBA (CNEL) along the roadway segment of Radford Avenue (between Moorpark Street and Woodbridge Street), as compared to the maximum noise increase 3.7 dBA (CNEL) under the Project. Therefore, while off-site noise impacts under Alternative 5 would be less than significant, such impacts would be greater when compared to the less-than-significant impacts of the Project.

[23] *Net daily trips increase equal to the Total Daily Trips minus the Existing Daily Trips. Project net daily trips equal to 16,435 – 7,783 = 8,652 and Alternative 5 net daily trips equal to 20,433 – 7,783 = 12,650.*

Given the greater operational noise levels under Alternative 5, a qualitative analysis of composite noise levels taking into consideration all operational activities was performed. Like the Project, impacts associated with composite noise levels during operation of Alternative 5 would be less than significant. Cumulative operational on- and off-site noise impacts would also be less than significant. However, all of these impacts would be greater under Alternative 5 when compared to the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

As noted above, the types of construction activities and associated equipment under Alternative 5 would be similar to the Project's. The on- and off-site vibration levels during construction would be similar to those of the Project, as construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment. As such, peak vibration levels generated by construction equipment and construction truck trips under Alternative 5 would be similar to those of the Project. Accordingly, construction activities under Alternative 5 would result in similar significant and unavoidable on- and off-site vibration impacts based on the significance threshold for human annoyance and less-than-significant on- and off-site vibration impacts based on the significance threshold for building damage as the Project.

(b) Operation

As described in Section IV.K, Noise, of this Draft EIR, sources of vibration related to Project operations would include vehicle circulation, delivery trucks, and building mechanical equipment. Similar sources of operational vibration would occur under Alternative 5. The additional residential component would not be expected to generate substantial sources of vibration. As with the Project, vehicular-induced vibration from Alternative 5 would not generate perceptible vibration levels at off-site sensitive uses. In addition, like the Project, building mechanical equipment installed as part of Alternative 5 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include vibration-attenuation mounts to reduce vibration transmission such that the vibration would not be perceptible at any off-site sensitive receptors. Therefore, as with the Project, operation of Alternative 5 would not increase vibration levels in the immediate vicinity of the Project Site. As such, vibration impacts associated with operation of Alternative 5 would also be less than significant and similar to the less-than-significant impacts of the Project.

I. Public Services

(1) Fire Protection

(a) Construction

The types of construction activities required for Alternative 5 would be similar to those of the Project, although the overall amount of development, associated construction activities, and construction traffic would be greater. As discussed in Section IV.L.1, Public Services—Fire Protection, of this Draft EIR, construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings, and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. Given the increased level of construction activity required under this alternative, the potential for accidental on-site fires would be increased. As with the Project, in accordance with OSHA safety and health regulations, construction managers and personnel for Alternative 5 would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities. Additionally, in accordance with OSHA provisions, fire suppression equipment (e.g., fire extinguishers) specific to construction activities would be maintained on-site. Additionally, as with the Project, construction of Alternative 5 would comply with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, as with the Project, compliance with applicable regulatory requirements under Alternative 5 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, thereby reducing the potential demand on fire protection services at the site during construction.

Additionally, as with the Project, construction activities associated with Alternative 5 would also add construction vehicles to the street network and could necessitate temporary partial lane closures for installation of required utility and street improvements. However, as with the Project, travel lanes would be maintained in each direction on all streets around the construction site throughout the construction period for Alternative 5, and emergency access would be maintained. In addition, like the Project, Alternative 5 would include implementation of a Construction Traffic Management Plan to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Also, as with the Project, Alternative 5 would include temporary traffic controls such as flag persons to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of vehicles that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, dedicated turn lanes for construction trucks, rerouting of construction trucks to reduce travel on congested streets, etc.) would also be implemented, as necessary, to ensure emergency access to the

construction site and traffic flow on adjacent rights-of-way are maintained. Additionally, haul truck staging would be prohibited on any streets adjacent to the Project Site, unless specifically approved as a condition of an approved haul route. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Overall, construction of Alternative 5, like the Project, would not require a new fire station or the expansion of an existing facility in order to maintain service levels, the construction of which would cause significant environmental impacts. As such, impacts on fire protection during construction of Alternative 5 would similarly be less than significant. Such impacts would be greater than the less-than-significant impacts of the Project due to the overall increase in floor area and resultant increased construction activities.

(b) Operation

Alternative 5 would generate a new residential population and employee population on the Project Site that would contribute to an increased demand for LAFD fire protection services. Specifically, Alternative 5 would generate approximately 1,674 new residents and an estimated net increase of 3,528 employees, creating a net new service population of 5,202 people, which is greater than the Project's estimated net increase of 4,139 employees or 4,589 employees under the maximum sound stage floor area scenario.[24] However, similar to the Project, Alternative 5 would comply with applicable Los Angeles Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarms, communications systems, and life safety features (e.g., automatic fire sprinkler systems, fire service access elevators, etc.) and would undergo LAFD fire/life safety plan review, which would reduce the demand for fire protection and emergency medical services and also ensure adequate emergency access.

Furthermore, as with the Project, traffic generated by Alternative 5 would not significantly impact emergency vehicle response to the Project Site and surrounding area as the drivers of emergency vehicles have the ability to bypass traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As with the Project, Alternative 5'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.

Additionally, given its density, Alternative 5 would be expected to have the same fire flow requirement as the Project (i.e., 6,000 to 9,000 gpm from four to six hydrants flowing

[24] *LADOT and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, Version 1.3, July 2020.*

simultaneously), and, thus, as with the Project, following the installation of additional hydrants, LADWP would be able to supply sufficient flow and pressure to satisfy the fire suppression needs of Alternative 5.

Alternative 5 would also generate General Fund tax revenues for the City that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate. Therefore, even with a greater overall demand on LAFD services when compared to the Project, it is assumed that operation of Alternative 5, like the Project, would not result in the need for new or physically altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service ratios, and impacts to fire protection associated with operation of Alternative 5 would be less than significant. However, such impacts would be greater than the less-than-significant impacts of the Project due to the increase in floor area and associated service population.

(2) Police Protection

(a) Construction

As discussed above, the types of construction activities under Alternative 5 would be similar to those of the Project; however, the overall amount of development, associated construction activities, and construction traffic would be greater than under the Project. Similar to the Project, construction of Alternative 5 would not generate a permanent population on the Project Site that would substantially increase the police service population of the North Hollywood Community Police Station because the daytime population generated during construction would be temporary in nature. In addition, the Project Site would continue to be enclosed with fencing, walls, or other barriers to prevent unauthorized access, and access to the Project Site would continue to be controlled by staffed guard houses. Alternative 5 would also implement similar project design features as the Project, which would include additional temporary security measures such as appropriate lighting, locked entry, and security patrols during construction, thereby reducing demand for police protection services. Therefore, as with the Project, construction of Alternative 5 would not contribute to a temporary increased demand for police protection services.

Furthermore, as previously discussed, while construction activities associated with Alternative 5 would also add construction vehicles to the street network and could necessitate temporary partial lane closures for installation of required utility and street improvements, as with the Project, travel lanes would be maintained in each direction on all streets around the construction site throughout the construction period for Alternative 5, and emergency access would be maintained. In addition, like the Project, Alternative 5 would include implementation of a Construction Traffic Management Plan to ensure that adequate and safe access remains available within and near the Project Site during construction

activities. Also, as with the Project, Alternative 5 would include temporary traffic controls such as flag persons to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of vehicles that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, dedicated turn lanes for construction trucks, rerouting of construction trucks to reduce travel on congested streets, etc.) would also be implemented, as necessary, to ensure emergency access to the construction site and traffic flow on adjacent rights-of-way are maintained. Additionally, haul truck staging would be prohibited on any streets adjacent to the Project Site, unless specifically approved as a condition of an approved haul route. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Overall, construction of Alternative 5, like the Project, would not require a new police station or the expansion of an existing facility in order to maintain service levels, the construction of which would cause significant environmental impacts. As such, impacts on police protection during construction of Alternative 5 would similarly be less than significant. Such impacts would be greater than the less-than-significant impacts of the Project due to the overall increase in floor area and resultant increased construction activities.

(b) Operation

As discussed in Section IV.L.2, Public Services—Police Protection, of this Draft EIR, the LAPD considers the residential population within their service area to evaluate service capacity. Alternative 5 includes studio uses and residential uses; therefore, this alternative would introduce a new permanent residential population to the Project Site that could generate a direct demand for police protection services. Therefore, Alternative 5 would increase the LAPD residential service population in the North Hollywood Division.

Specifically, Alternative 5 would generate approximately 1,674 new residents and an estimated net increase of 3,528 employees, creating a total service population of 5,202 people, which is greater than the Project's estimated net increase of 4,139 employees or 4,589 employees under the maximum sound stage floor area scenario.[25]

Alternative 5 would also implement similar security features as the Project to enhance safety within and immediately surrounding the Project Site, which would reduce the demand for police protection services, including a 24/7 security plan, private on-site security staff, and regular security patrols. In addition to these security features, Alternative 5, as with the

[25] *LADOT and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, Version 1.3, July 2020.*

Project, would also generate General Fund tax revenues for the City that could be used to expand law enforcement resources in the North Hollywood Division, similar to the Project. Therefore, Alternative 5, like the Project, would not result in the need to construct new police protection facilities or modify existing facilities, the construction of which would cause significant environmental impacts, in order to maintain service ratios, and impacts to police protection associated with operation of Alternative 5 would be less than significant. However, such impacts would be greater than the less-than-significant impacts of the Project due to the introduction of a residential population.

m. Transportation

As previously described, Alternative 5 would be developed within the same Project Site as the Project. As such, the plans, policies, and programs applicable to the Project would also apply to Alternative 5. These include the Mobility Plan, Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan, Plan for a Healthy Los Angeles, the LAMC, the CVC, Vison Zero, RIO, and Citywide Design Guidelines. As with the Project, Alternative 5 would not conflict with these plans, policies and regulations. In particular, Alternative 5 would include the Radford Bridge that would provide pedestrian and bicycle connections within the Project Site vicinity, the Mobility Hubs, which would promote TDM and reduce VMT, and the Class IV bikeway along Radford Avenue that would promote bicycle access in the Project Site vicinity. Like the Project, Alternative 5 would also prioritize safety and access for all individuals utilizing the Project Site by complying with all ADA and LAMC requirements related to pedestrian, vehicle and bicycle access. Furthermore, like the Project, Alternative 5 represents urban infill development within a SCAG-designated Livable Corridor and HQTC in close proximity to transit and housing which would encourage alternative transportation use and a reduction in VMT. As with the Project, Alternative 5 would also promote pedestrian activity and reduce VMT by providing convenient and adequate bicycling facilities; and enhancing the streetscape adjacent to the Project Site through the provision of new landscaping and street trees, lighting, wayfinding signage, and pedestrian/transit amenities such as benches and a protected bikeway. Like the Project, Alternative 5 would also implement a TDM Program to reduce VMT, consistent with the goals of the Mobility Plan, Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan, and the City's TDM Ordinance. Therefore, as with the Project, Alternative 5 would not conflict with an applicable program, plan, ordinance, or policy addressing the circulation system. Impacts would be less than significant and similar to the less-than-significant impacts of the Project.

Based on the population assumptions, Alternative 5 would generate an average daily household VMT of 7.1 per capita and an average daily work VMT of 6.9 per capita, which would be below the average daily household VMT per capita significance threshold of 9.4 for the South Valley APC and below the average daily work VMT per capita significance

threshold of 11.6 for the South Valley APC.[26] Therefore, as with the Project, Alternative 5 would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b) regarding VMT, and impacts would be less than significant. However, with the increased VMT, such impacts would be greater than the less-than-significant impacts of the Project.

Regarding freeway safety, as required by LADOT's Interim Guidance for Freeway Safety Analysis, if a project is not expected to generate more than 25 or more peak-hour trips at any freeway off-ramps, then a freeway ramp analysis is not required. As discussed in Section IV.M, Transportation, of this Draft EIR, the Project would add 25 or more peak-hour trips to the surrounding off-ramps during the morning and afternoon peak hours. With the increased floor area under Alternative 5, Alternative 5 would similarly generate more than 25 peak-hour trips thereby requiring a freeway ramp analysis.

As detailed in Table 2 of the Alternatives Transportation Memorandum, Alternative 5 would generate four more A.M. peak-hour trips than the Project and 16 more inbound P.M. peak-hour trips than the Project. As such, Alternative 5 would add more than 25 peak-hour trips to the following four freeway off-ramps:

- US 101 Northbound Off-Ramp to Laurel Canyon Boulevard
- US 101 Southbound Off-Ramp to Laurel Canyon Boulevard
- SR 170 Southbound Off-Ramp to Riverside Drive
- SR 134 Westbound Off-Ramp to Lankershim Boulevard

Therefore, further queue analyses were conducted for the anticipated Project buildout year of 2028 and the long-term buildout year of 2045. As detailed in Tables 9 and 10, similar to the Project, none of the four analyzed off-ramps would have queues that would both exceed the ramp storage length and include Alternative 5 related vehicles that would add 50 or more feet to any queue during any of the analyzed peak hours compared to Future without Project Condition (Year 2028 and Year 2045). Thus, consistent with the Project, Alternative 5 would neither be subject to speed differential analyses nor cause a significant safety impact, and no mitigation is required.

n. Tribal Cultural Resources

As detailed in Section IV.N, Tribal Cultural Resources, of this Draft EIR, the SLF records search results were negative for tribal cultural resources and the SCCIC records search did not identify any known tribal cultural resources within the Project Site.

[26] *See Appendix R.1 of this Draft EIR for VMT Calculator Outputs for Alternatives.*

Additionally, the geoarchaeological investigation conducted as part of the TCR Report indicates that while no artifacts were found, the Project Site may contain historical-period archaeological deposits and prehistoric archaeological deposits. Therefore, the entire Project Site is considered highly sensitive for tribal cultural resources. As discussed in Section IV.N, Tribal Cultural Resources, of this Draft EIR, the Project's impacts on tribal cultural resources were concluded to be less than significant with implementation of mitigation measures.

As previously discussed, like the Project, excavation under Alternative 5 would extend up to approximately 50 feet below the existing ground surface. Therefore, like the Project, Alternative 5 has the potential to uncover previously unidentified tribal cultural resources. However, this potential would be less compared to the Project due to the reduced excavation footprint and cut activities under this alternative. Specifically, Alternative 5 would involve approximately 605,000 cubic yards of cut compared to 935,000 cubic yards under the Project. Alternative 5 would comply with the same regulatory requirements and, like the Project, implement Mitigation Measure TR-MM-1. As such, like the Project, potential impacts to tribal cultural resources under Alternative 5 would be less than significant with mitigation. However, with the reduced excavation footprint and reduced cut activities, such impacts would be less than the less-than-significant-with-mitigation impacts of the Project.

o. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities for Alternative 5 would result in a temporary water demand for dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. Despite the increase in floor area and construction activity, construction-related water use under Alternative 5 would be less than under the Project due to the reduced excavation activities and footprint. Furthermore, while Alternative 5 would require trenching for connection to the existing water mains in the adjacent streets similar to the Project, Alternative 5 would similarly implement a Construction Traffic Management Plan to ensure the safe and efficient flow of pedestrian and vehicular traffic around the Project Site during construction. In addition, as with the Project, Alternative 5 would construct all water mains and connections in accordance with applicable regulatory requirements to ensure the long-term service of water in the Project Site vicinity and adequate fire flow to the Project Site. Thus, the construction of these water mains and improvements would not result in significant environmental impacts related to utility infrastructure. Therefore, impacts under Alternative 5 related to water supply and infrastructure during construction would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project. Refer to Section IV.K, Noise, of this Draft EIR regarding the potential construction noise impacts associated with the off-site water infrastructure improvements.

(b) Operation

As discussed in Section IV.N.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, based on the WSA prepared for the Project, operation of the Project would generate a demand for water that would be accommodated by LADWP's future water supplies and impacts associated with the demand for water would be less than significant. As with the Project, Alternative 5 would result in an increase in long-term water demand. Based on the increase in total floor area as compared to the Project and the introduction of residential uses, water demand for Alternative 5 would be greater than the Project's water demand. As shown in Table V-7 on page V-193, the water demand for Alternative 5 would be an estimated 374,433 gpd (420 afy), as compared to the Project's water demand of an estimated 312,890 gpd (351 afy) under the Project.

Despite the higher demand, based on the projected water demand estimates for LADWP's service area from the 2020 UWMP (discussed in Section IV.O.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR), Alternative 5 would represent a very small proportion (less than 0.1 percent) of LADWP's projected water demand and supply in 2025 for normal, single-dry, and multiple-dry years (i.e., 0.065 percent, 0.062 percent, and 0.064 percent), similar to the Project.[27,28] Furthermore, as outlined in its 2020 UWMP, LADWP is committed to providing a reliable water supply for the City. The 2020 UWMP takes into account climate change and the concerns of drought and dry weather and notes that the City of Los Angeles will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. The 2020 UWMP also furthers the goals of the Green New Deal, addresses the current and future State Water Project supply shortages, and concludes that MWD's actions in response to the threats to the State Water Project would ensure the continued reliability of its water deliveries. By focusing on demand reduction and alternative sources of water supplies, LADWP will further ensure that long-term dependence on MWD supplies will not be exacerbated by potential future shortages. Additionally, as reaffirmed in the Green New Deal, the City is committed to conserving and recycling water to help meet future water demands in the City.

Thus, as with the Project, the estimated water demand under Alternative 5 is expected to be met by LADWP's projected water supplies, including in normal, single-dry, and multi-dry years.

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[27] *Both the Project and Alternative 5 are compared to LADWP's projected 2025 water demand and supply because this is the closest of the 2020 UWMP's five-year projections to the Project's anticipated buildout year of 2028.*

[28] *[(420 af ÷ 642,600 af) * 100] = ~0.065%; [(420 af ÷ 674,700 af) * 100] = ~0.062%; and [(420 af ÷ 657,900 af) * 100] = ~0.064%.*

Table V-7
Alternative 5 Estimated Water Demand

Land Use	Quantity/ Floor Area	Sewer Generation Rate (gpd/unit)[a]	Demand (gpd)
Total Existing Water Demand to be Removed[b]			**16,978**
Proposed New Construction			
Residential	743 du	150[c]	111,450
Sound Stage	155,580 sf	0.05	7,779
Production Support	211,421 sf	0.05	10,571
Production Office	379,791 sf	0.12	45,575
General Office	378,083 sf	0.12	45,370
Restaurant[d]	1,000 seats (30,000 sf)	30	30,000
Retail	30,000 sf	0.025	750
Mobility Hubs[e]	54,200 sf	0.05	2,710
Landscaping[f]	219,811 sf		21,577
Covered Parking[g]	1,574,540 sf	0.02	1,035
Cooling Tower[h]	4,750		169,290
Base Demand Adjustment			1,062[i]
Subtotal Water Demand			*447,169*
Less Required Ordinances Water Savings			*(54,957)*[i]
Less Existing to be Removed			*(16,978)*
Less Additional Conservation			*(791)*[i]
Net Additional Water Demand			**374,443**

sf = square feet

gpd = gallons per day

du = dwelling unit

[a] *The average daily flow based on 100 percent of City of Los Angeles sewerage generation factors.*

[b] *Per the WSA, the existing water usage associated with floor area to be removed as part of the Project was estimated by applying a ratio of the demolished area to the average of the five-year water billing record from October 2018 to September 2023. A percentage of this number was then derived from the difference in uses to be removed as part of the Project versus the uses to be removed as part of Alternative 5. That percentage (93 percent) was then applied to LADWP's estimated water demand from existing uses to be removed to determine the existing water demand associated with the uses to be removed as part of Alternative 5.*

[c] *Assumes all dwelling units are 2-bedroom units.*

[d] *Of the 60,000 square feet of retail/restaurant uses, assumes half will be restaurant uses.*

[e] *Mobility Hub area is not included in the total floor area. Assumes that two on-site Mobility Hubs would be provided under Alternative 5 similar to the Project.*

[f] *Conservatively assumes Alternative 5 would include the same landscaping areas as the Project. With the residential uses, landscaping would likely increase.*

Table V-7 **(Continued)**
Alternative 5 Estimated Water Demand

Land Use	Quantity/ Floor Area	Sewer Generation Rate (gpd/unit)[a]	Demand (gpd)
[g] *The WSA assumes cleaning of parking areas twelve times per year with a total daily average of 1,142 gpd. Alternative 5 would include the fewer parking spaces compared to the Project (5,485 spaces under Alternative 5 compared to 6,050 parking spaces under the Project. Thus the number is adjusted by 90 percent to reflect the reduction in spaces.*			
[h] *Assumes the same cooling tower water demand for Alternative 5 as the Project.*			
[i] *Assumes the same water conservation and base demand as the Project.*			
Source: LADWP, Water Supply Assessment for the Radford Studio Center Project, adopted December 7, 2023, included in Appendix Q of this Draft EIR; Eyestone Environmental, 2025.			

Furthermore, similar to the Project, Alternative 5 would implement all necessary on-site infrastructure and connections to the LADWP water system pursuant to applicable City requirements. Specifically, similar to the Project, Alternative 5 would obtain its domestic water from new laterals (e.g., domestic services) between the proposed on-site buildings and the existing and proposed water mains in surrounding streets. In addition, given its density, Alternative 5 would be expected to have the same fire flow requirement as the Project and would incorporate similar water infrastructure improvements as the Project to meet the required fire flow. All water infrastructure would be constructed in accordance with regulatory requirements. Therefore, impacts under Alternative 5 related to water supply and infrastructure during operation would be less than significant, and such impacts would be greater than the less-than-significant impacts of the Project due to the increased water demand. Refer to Section IV.K, Noise, of this Draft EIR regarding the potential construction noise impacts associated with wastewater infrastructure improvements.

(2) Wastewater

(a) Construction

As discussed in Section IV.O.2, Utilities and Service Systems—Wastewater, of this Draft EIR, wastewater generation may occur incrementally throughout construction of Alternative 5, and wastewater flows would be greater compared to the Project due to the overall increase in development and associated increased number of construction workers. As with the Project, temporary facilities for construction workers, such as portable toilets and hand wash areas, would be provided by the construction contractor. Sewage generated from these facilities would be collected and hauled off-site and would not be discharged directly into the public sewer system. As such, construction would not contribute directly to the wastewater system that serves the Project Site. While the sewage hauled off-site would eventually be deposited at the HWRP, the amount generated during construction activities would be a fraction of what is currently generated by the existing uses to be removed. Thus,

wastewater generation from construction of Alternative 5 is not anticipated to cause a measurable increase in wastewater flows that would result in the need for new or expanded wastewater treatment facilities.

As with the Project, new sewer line connections would be required to connect the proposed buildings to the main sewer infrastructure system in the streets surrounding the site. Construction impacts associated with new connections would primarily be confined to trenching in order to place the sewer line connections below the surface to connect to the existing off-site public infrastructure, and any off-site work that could potentially affect existing sewer service to adjacent properties would be coordinated with the City of Los Angeles Bureau of Engineering. As with the Project, Alternative 5 would similarly implement a Construction Traffic Management Plan to ensure the safe and efficient flow of pedestrian and vehicular traffic around the Project Site during construction. As such, construction of Alternative 5, as with the Project, would not require or result in the relocation or construction of new or expanded wastewater facilities, the construction or relocation of which could cause significant environmental effects related to utilities. Therefore, similar to the Project, impacts under Alternative 5 related to wastewater during construction would be less than significant.

(b) Operation

As with the Project, operation of Alternative 5 would increase wastewater flows from the Project Site compared to existing conditions. Based on the increase in total floor area and the introduction of residential uses, operational wastewater generation under Alternative 5 would be greater than under the Project. Specifically, as shown in Table V-8 on page V-196, wastewater generation for Alternative 5 is estimated to be 522,611 gpd, as compared to the Project's estimated wastewater generation of 486,320 gpd under the proposed development program.

As provided in Section IV.O.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the wastewater generated during Project operation could be accommodated by the existing remaining capacity of the HWRP. The HWRP has a capacity of 450 mgd, and current average wastewater flows are approximately 263.6 mgd. Accordingly, the remaining available capacity at the HWRP is approximately 186.4 mgd, which would be sufficient to accommodate Alternative 5's wastewater flows (which would represent approximately 0.3 percent of the current estimated 186.4 mgd of remaining available capacity at the HWRP).

Regarding wastewater conveyance (sewer) capacity, as discussed in Section IV.O.2, Utilities and Service Systems—Wastewater, of this Draft EIR, sewer service for the Project would be provided utilizing new or existing on-site sewer connections to the existing off-site sewer lines in the adjacent streets. Based on the Utility Report provided in Appendix M of

Table V-8
Alternative 5 Estimated Wastewater Generation

Land Use	Quantity/ Floor Area	Sewer Generation Rate (gpd/unit)[a]	Demand (gpd)
Total Existing Generation to be Removed[b]			**16,978**
Proposed New Construction			
Residential	743 du	150[c]	111,450
Sound Stage	155,580 sf	0.05	7,779
Production Support	211,421 sf	0.05	10,571
Production Office	379,791 sf	0.17	64,564
General Office	378,083 sf	0.17	64,274
Restaurant[d]	2,000 seats	30	30,000
Retail	30,000 sf	0.025	750
Mobility Hubs[e]	54,200 sf	0.05	2,710
Covered Parking[f]	1,736,730 sf	0.02	31,491
Sewer Ejector[g]			216,000
Subtotal Wastewater Generation			*539,589*
Less Existing to be Removed			*(16,978)*
Net Additional Wastewater Generation			**522,611**

sf = square feet

gpd = gallons per day

du = dwelling unit

[a] *The average daily flow based on 100 percent of City of Los Angeles sewerage generation factors.*

[b] *Per the WSA, the existing water usage associated with floor area to be removed as part of the Project was estimated by applying a ratio of the demolished area to the average of the five-year water billing record from October 2018 to September 2023. A percentage of this number was then derived from the difference in uses to be removed as part of the Project versus the uses to be removed as part of Alternative 5. That percentage was then applied to LADWP's estimated water demand from existing uses to be removed to determine the existing water demand associated with the uses to be removed as part of Alternative 5.*

[c] *This analysis assumes all dwelling units are 2-bedroom units.*

[d] *Conservatively assumes 1 seat per 30 sf, or 1,000 seats per 30,000 sf. Retail/Restaurant is assumed to be 50 percent restaurant use.*

[e] *Mobility Hub area is not included in the total floor area. Assumes that two on-site Mobility Hubs would be provided under Alternative 5 similar to the Project*

[f] *The WSA assumes cleaning of parking areas twelve times per year with a total daily average of 1,142 gpd. Alternative 5 would include the fewer parking spaces compared to the Project (5,485 spaces under Alternative 5 compared to 6,050 parking spaces under the Project). Thus, the number is adjusted by 90 percent to reflect the reduction in spaces.*

[g] *Estimated required sewer ejector pump discharge from areas that cannot connect to the City sewer mains by gravity.*

Source: LADWP, Water Supply Assessment for the Radford Studio Center Project, adopted December 7, 2023; KPFF, Utility Technical Report for Radford Studio Center Project, January 2025. Refer to Appendices Q and M of this Draft EIR, respectively.

this Draft EIR, the Project flows would be well within the 50 percent design capacity of the surrounding sewer lines. As Alternative 5 would result in a limited increase in wastewater flows compared to the Project, it is anticipated that the existing sewer capacity would similarly accommodate Alternative 5. Notwithstanding, as with the Project, additional detailed gauging and evaluation would be conducted for Alternative 5, as required by LAMC Section 64.14, to obtain final approval of a sewer capacity and connection permit during the permitting process. Furthermore, like the Project, all sanitary sewer connections and on-site infrastructure under Alternative 5 would be designed and constructed in accordance with applicable regulatory standards.

Based on the above, operation of Alternative 5, as with the Project, would not require or result in the relocation or construction of new or expanded wastewater conveyance or treatment facilities, the construction or relocation of which could cause significant environmental effects. Therefore, impacts under Alternative 5 related to wastewater during operation would be less than significant. However, such impacts would be greater than the less-than-significant impacts of the Project due to the increased wastewater generation under Alternative 5.

(3) Solid Waste

(a) Construction

As with the Project, construction of Alternative 5 would involve demolition and building construction activities. As provided in Table V-9 on page V-198, the amount of construction waste would be greater than the Project since the overall amount of floor area would be greater than under the Project. As discussed in Section IV.O.3, Utilities and Service Systems—Solid Waste, of this Draft EIR, pursuant to the requirements of SB 1374, a minimum of 75 percent of non-hazardous demolition and construction debris would be recycled and/or salvaged. Applying this rate, Alternative 5 would dispose of approximately 13,528 tons of construction-related waste in the County's permitted inert landfill (i.e., Azusa Land Reclamation) over the construction period. This is an increase compared to the Project's estimated construction-related waste of 13,329 tons. However, as with the Project, the amount of construction and debris waste generated by Alternative 5 would similarly represent a small percentage (0.025 percent) of the Azusa Land Reclamation's existing remaining disposal capacity of 50.77 million tons.[29] Thus, similar to the Project, construction of Alternative 5 would not result in the need for an additional disposal facility to adequately handle construction-related waste associated with Alternative 5. Additionally, as with the Project, Alternative 5's construction and demolition waste would be hauled by a private construction contractor permitted by the City with existing established haul routes.

[29] *(12,611 tons ÷ 50.77 million tons) x 100 = ~0.0246 = ~0.025 percent*

Table V-9
Alternative 5 Demolition and Construction Waste Generation

Land Use	Size	Generation Rate (lbs/sf)[a]	Total (tons)[b]
Demolition Waste (Existing Uses to Be Removed)			
Studio/Production and Related Uses	646,120 sf	155	50,074
Total Demolition Waste			*50,074*
Construction Waste (Proposed New Uses)			
Studio/Production and Related Uses	1,231,010 sf	3.89	2,394
Residential Uses	750,000 sf (743 du)	4.38	1,643
Total Construction Waste			*4,037*
Total (prior to diversion)			**54,111**
Total (after 75% diversion)			**13,528**

lbs = pounds

sf = square feet

1 ton = 2,000 pounds

[a] *USEPA, Report No. EPA530-98-010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, Table 3, Table 4, and Table 6. Generation rates used in this analysis are based on an average of various non-residential building types.*

[b] *Numbers may not sum due to rounding.*

Source: Eyestone Environmental, 2025.

Furthermore, similar to the Project, the Alternative would comply with applicable regulatory requirements regarding the disposal of construction-related hazardous waste.

Based on the above, impacts related to solid waste during construction would be less than significant, though such impacts would be greater than the less-than-significant impacts of the Project.

(b) Operation

During its operation, Alternative 5 would generate municipal solid waste typical of studio-related and residential uses. Similar to the Project, solid waste generated by Alternative 5 would be recycled or collected by private waste haulers contracted by the Applicant and permitted by the City and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles. The transport of solid waste generated by Alternative 5 to waste management/ disposal facilities would continue to occur along existing solid waste routes of travel. As such, as with the Project, Alternative 5 would not result in

the need for additional solid waste collection routes to adequately handle waste generated by operations under Alternative 5.

As with the Project, operation of Alternative 5 would generate additional solid waste requiring disposal in available landfills. Based on the increase in total floor area and the introduction of residential uses, solid waste generation under Alternative 5 would be greater than under the Project. Specifically, as provided in Table V-10 on page V-200, when accounting for the existing uses to be removed as part of the Project, Alternative 5 would generate a net increase of approximately 6,141 tons of Class III solid waste annually compared to the Project's 7,881 tons generated by the Project (or 8,139 tons under the maximum solid waste demand scenario). When accounting for a diversion rate consistent with the Citywide diversion rate of 76.4 percent, Alternative 5 would generate a net increase of approximately 1,449 tons of Class III solid waste annually compared to the 1,860 tons generated by the Project (or 1,921 tons under the maximum solid waste demand scenario).

As provided in Section IV.O.3, Utilities and Service Systems—Solid Waste, of this Draft EIR, the estimated remaining capacity for the County's Class III landfills currently accepting solid waste is approximately 71.3 million tons. Thus, Alternative 5's net increase of approximately 1,449 tons of Class III solid waste after diversion would represent approximately 0.002 percent of the estimated approximately 71.3 million tons of remaining Class III landfill capacity available.[30] As with the Project, Alternative 5's estimated solid waste generation would therefore represent a nominal percentage of the remaining daily disposal capacity of those landfills. As such, like the Project, operation of Alternative 5 would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, solid waste impacts during operation of Alternative 5 would be less than significant and less than the less-than-significant impacts of the Project due to the overall reduction in solid waste.

(4) Electric Power, Natural Gas, and Telecommunications Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 5 would consume electricity (construction activities do not typically involve the consumption of natural gas or use of hard-wired telecommunications facilities). The energy consumed during construction of Alternative 5 would be greater than under the Project due to the increase in floor area and associated construction activities. Like the Project, the energy demand

[30] *(1,449 tons ÷ 71.3 million tons) × 100 = ~0.002 percent*

Table V-10
Alternative 5 Estimated Operational Solid Waste Generation

Land Use	Size	Employee Generation Rate per sf[b]	Estimated Number of Employees	Solid Waste Generation Rate[c,d]	Total Generation (tons/year)
Existing Uses					
Sound Stage	359,730 sf	0.0056	2,014 emp	1.09 tn/emp/yr	2,196
Production Support	255,510 sf	0.002	511 emp	2.02 tn/emp/yr	1,032
Production Office	450,060 sf	0.004	1,800 emp	2.02 tn/emp/yr	3,636
General Office	113,810 sf	0.004	455 emp	2.02 tn/emp/yr	920
Total Existing Uses					*7,784*
Total Uses at Buildout					
Residential	743 du	N/A	N/A	2.23 tn/du/yr	1,657
Sound Stage	379,000 sf	0.0056	3,220 emp	1.09 tn/emp/yr	2,313
Production Support	300,000 sf	0.002	350 emp	2.02 tn/emp/yr	1,212
Production Office	575,000 sf	0.004	2,900 emp	2.02 tn/emp/yr	4,646
General Office	450,000 sf	0.004	2,800 emp	2.02 tn/emp/yr	3,636
Retail/Restaurant	60,000 sf	0.004	100 emp	1.92 tn/emp/yr	461
Total Proposed Uses					*13,925*
Total Net Increase					**6,141**
Total Net Disposal (After 76.4% Diversion)[e]					**1,449**

emp = employee

sf = square feet

tn/emp/yr = tons per employee per year

[a] *Numbers may not precisely add due to rounding.*

[b] *Except for sound stages, employee generation rates are from Los Angeles Department of Transportation and City Planning, City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. Assumes general retail rate for production support and general office rate for production office and general office. For sound stage, rounded rate assumes 100 employees for a typical 18,000-square-foot sound stage as a scalable density; employment rate from Manhattan Beach Studios (MBS), June 2021.*

[c] *Residential solid waste generation factor based on a rate of 12.23 pounds per household per day (or 2.23 tons per household per year), pursuant to the L.A. CEQA Thresholds Guide.*

[d] *Solid waste generation rates are from CalRecycle's Disposal and Diversion Rates for Business Groups, www2.calrecycle.ca.gov/wastecharacterization/businessgrouprates, accessed August 27, 2024. To present a conservative analysis, the Services – Professional Technical, & Financial rate was used for the office use and Retail Trade—Food & Beverage Stores rate was used for the retail use because these categories have the highest generation rates. The Not Elsewhere Classified rate was used for the sound stages because no comparable category is provided.*

[e] *Consistent with the current Citywide diversion rate of 76.4 percent.*

Source: Eyestone Environmental, 2025.

associated with construction would be within the energy already generated by the existing uses to be removed. Additionally, as with the Project, Alternative 5 would be required to coordinate energy infrastructure improvements with LADWP and SoCalGas and develop on-site energy infrastructure and connections to the existing off-site energy infrastructure in

accordance with applicable regulatory requirements. Hence, like the Project, construction activities under Alternative 5 would not result in an increase in energy demand that exceeds available distribution infrastructure capabilities that would require the construction of new or expanded energy facilities, the construction of which could cause significant environmental effects. Therefore, impacts on electricity, natural gas, and telecommunications infrastructure associated with short-term construction activities under Alternative 5 would be less than significant and greater than the less-than-significant impacts of the Project due to the increase in development.

(b) Operation

As with the Project, operation of Alternative 5 would increase the demand for electricity, natural gas, and telecommunications relative to existing conditions. However, Alternative 5 operations would result in increased demand compared to the Project due to the increased floor area and introduction of residential uses. Therefore, Alternative 5 would result in increased operational impacts on energy and telecommunications infrastructure when compared to the Project. As discussed in the Utility Report, LADWP and SoCalGas have confirmed that the existing energy infrastructure in the area is sufficient to serve the Project. Additionally, as it relates to natural gas, like the Project, Alternative 5 would comply with the City's all-electric buildings ordinance (Ordinance No. 187,714). Although Alternative 5 would result in greater operational energy demand than the Project, the existing energy infrastructure in the area is expected to be adequate to serve Alternative 5. Similarly, private telecommunications providers would be expected to expand service capacities as needed to meet demand. Therefore, as with the Project, Alternative 5 operation would not result in an increase in energy or telecommunications demand that exceeds available distribution infrastructure capabilities that would require the construction of new or expanded facilities, the construction of which could cause significant environmental effects. Impacts on electricity, natural gas, and telecommunications infrastructure under Alternative 5 would be less than significant and greater than the less-than-significant impacts of the Project.

3. Comparison of Impacts

Based on the analysis provided above, Alternative 5 would not avoid the Project's significant and unavoidable project and cumulative impacts with respect to regional emissions of NO_X during construction; however, such impacts would be less than those of the Project due to the reduction in the export of soils during construction. With the addition of residential uses and increased floor area, Alternative 5 would result in a new impact during operation of the Project associated with regional VOC emissions. This new impact together with the Project's NO_X impact would also occur during overlap of construction and operational activities. Thus, Alternative 5 would increase the extent of the significant and unavoidable impacts associated with potential concurrent construction and operational activities.

With regard to construction noise, Alternative 5 would reduce the Project-level and cumulative impacts associated with off-site noise during construction. However, impacts would remain significant and unavoidable. In addition, impacts associated with on-site construction and on- (Project-level and cumulative) and off-site (Project-level) vibration (human annoyance) during construction would be similar to those of the Project and would be significant and unavoidable.

Alternative 5 would reduce some of the Project's impacts that would be less than significant after mitigation, including localized emissions (construction), biological resources (special status species and conflicts with plans), archaeological resources, paleontological resources, hazards and hazardous materials (construction), and tribal cultural resources. Alternative 5 would also result in similar less-than-significant impacts after mitigation as the Project with regard to historical resources.

Alternative 5 would result in similar impacts to the Project associated with the following environmental topics, where the Project's impacts were concluded to be less than significant: TACs (construction); biological resources (protected wetlands); geologic hazards; GHG emissions (construction); surface water hydrology; surface water quality (construction); groundwater quality; groundwater hydrology (operation); on-site noise (operation); on-site and off-site vibration (based on the significance threshold for building damage) (construction); vibration (operation); transportation (consistency with transportation plans, programs, and policies); and wastewater (construction).

Alternative 5 would result in greater (but less than significant) impacts associated with the following environmental topics, where the Project's impacts were concluded to be less than significant: aesthetics (consistency with applicable regulations governing scenic quality, light and glare and scenic vistas); localized emissions (operation); TACs (operation); energy (consumption of energy) (construction); GHG emissions (operation); hazards and hazardous materials (operation); surface water quality (operation); land use and planning; off-site noise (operation); fire protection and police protection (construction and operation); transportation (VMT and freeway safety); water supply and infrastructure (operation); wastewater (operation); solid waste (construction); and electric power, natural gas, and telecommunications infrastructure.

Alternative 5 would result in less-than-significant impacts related to biological resources (wildlife movement); human remains; groundwater hydrology; water supply and infrastructure (construction); and solid waste (operation), that would be less when compared to the Project's less-than-significant impacts.

4. Relationship of the Alternative to Project Objectives

Alternative 5, the Residential Mixed-Use Alternative, would involve a mixed-use development with studio, commercial uses, and residential uses.

Given the mixed-use nature of this alternative, Alternative 5 would not meet the underlying purpose of the Project, which is to maintain Radford Studio Center as a studio and to modernize and enhance production facilities within the Project Site to accommodate both the existing unmet and anticipated future demands of the entertainment industry, keep production activities and jobs in Los Angeles, upgrade utility and technology infrastructure, and create a cohesive studio lot. Regarding the Project objectives, Alternative 5 would meet the following Project objectives as generally effectively as the Project:

- Enhance access through the provision of multiple safe, secure, and efficient entry points to the Project Site. Additionally, ensure the Project is consistent with the intent of the Los Angeles River Revitalization Master Plan, provides an enhanced public right-of-way to promote walkability, strengthens bicycle access, and fosters safety and connectivity in the local community.

- Provide multi-modal transportation solutions, including Project Mobility Hubs with services that are integrated with public transit lines and encourage alternative means of transportation and mobility.

- Create a model of sustainability in modern production studio development and operations by committing to an all-electric development, and integrating best management practices with regard to water, energy, and resource conservation.

Alternative 5 would partially meet the following Project objectives or would not meet the objectives as well as the Project, due to the reduced amount of studio-related development under this alternative:

- Grow the local and regional economy by providing a wide range of entertainment and media-related jobs and keeping production jobs in Los Angeles.

- Enhance the identity of the Project Site as an iconic entertainment and media center by providing an architecturally distinct design and a creative signage program that reflects and complements the production, media, and entertainment uses on-site.

- Establish clear guidelines to preserve historic elements of the studio while modernizing and expanding the studio to ensure its continued operational success in the future.

Alternative 5 would not meet all or portions of the following objectives, due to the nature of the alternative and the location of proposed development under this alternative's conceptual layout:

- Ensure the Project Site retains existing studio uses and provide an expandable and flexible production platform, including sound stages, production support, and office space regulated through the establishment of a Specific Plan to respond to evolving market demands and studio production needs while ensuring compatibility with applicable local and regional plans, specifically the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan.

- Create an integrated studio campus that is capable of addressing the evolving demands of the media and entertainment industry, incorporates a mix of compatible land uses, and ensures the Project is compatible with the immediate neighborhood by concentrating building heights away from Project Site edges.

- Optimize the currently underutilized Project Site to accommodate the existing unmet and anticipated future demands of the entertainment industry by providing new, state-of-the-art sound stages, production support facilities, production offices, and general offices, and upgraded on-site elements such as circulation, staging, basecamp, outdoor production and parking areas, while remedying past haphazard building additions and prioritizing efficient production operations.

V. Alternatives

F. Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines states 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 Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives.

With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible alternatives includes Alternative 1, No Project/No Build Alternative; Alternative 2, Development in Accordance with Existing Zoning Alternative; Alternative 3, Reduced Density Alternative; Alternative 4, Reduced Excavation/ Grading Alternative; and Alternative 5, Residential Mixed-Use Alternative. Table V-2 on page V-14 provides a comparative summary of the environmental impacts anticipated under each alternative with the environmental impacts associated with the Project. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the Project.

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.

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 demonstrates that Alternative 4, the Reduced Excavation/Grading Alternative, would be the Environmentally Superior Alternative. As discussed above, although Alternative 4 would not avoid the Project's significant and unavoidable impacts associated with regional emissions during construction, Alternative 4 would result in the greatest level of reduction in regional NO_X emissions when compared with the other alternatives. As such, Alternative 4 would also reduce the Project-level and cumulative air quality impacts related to concurrent construction and operations. With the substantial reduction in daily haul truck trips, Alternative 4 would also substantially reduce the Project's off-site construction noise impact although the impact would remain significant and unavoidable.

Alternative 4 would also reduce some of the Project's impacts that would be less than significant after mitigation, including the following: localized emissions (construction),

archaeological resources, paleontological resources, hazards and hazardous materials (construction), and tribal cultural resources. Alternative 4 would also result in less-than-significant impacts related to TACs (construction), human remains, GHG emissions (construction), surface water quality and hydrology (construction), groundwater quality and hydrology (construction), fire protection and police protection (construction), water supply (construction), and energy (construction) that would be less when compared to the Project's less-than-significant impacts.

The only impact area where Alternative 4 would result in greater impacts than the Project is related to aesthetics. Impacts would be greater due to the increase in building heights but would remain less than significant. Impacts associated with all other environmental topics would be similar to the Project.

As discussed above, Alternative 4 would also still meet the underlying purpose of the Project, which is to maintain Radford Studio Center as a studio and to modernize and enhance production facilities within the Project Site to accommodate both the existing unmet and anticipated future demands of the entertainment industry, keep production activities and jobs in Los Angeles, upgrade utility and technology infrastructure, and create a cohesive studio lot. Additionally, as discussed above, while Alternative 4 would be the environmentally superior alternative, it would not meet all of the Project objectives to the same extent of the Project.