IV. Environmental Impact Analysis

J. Land Use and Planning

1. Introduction

This section analyzes the Project's potential impacts with regard to land use and planning. The analysis in this section evaluates whether the Project would conflict with any land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The Project's potential impacts related to the potential physical division of an established community were fully evaluated in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR.

Analyses of consistency and/or potential conflicts with plans that are more directly related to other environmental topics are addressed in other sections of this Draft EIR, including Section IV.B, Air Quality, which evaluates the Project's consistency with the South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan (AQMP) and the City of Los Angeles (City) General Plan (General Plan) Air Quality Element; Section IV.G, Greenhouse Gas Emissions, which evaluates the Project's consistency with the 2022 Scoping Plan, the Los Angeles Green Building Code, and the City's Green New Deal; Section IV.M, Transportation (and the Transportation Assessment included as Appendix O.1 of this Draft EIR), which evaluates the Project's consistency with the City's Circulation Element (Mobility Element) and Vision Zero Action Plan, as well as many of the plans discussed herein as they relate to transportation; and Section IV.O.1, Utilities and Service Systems—Water Supply and Infrastructure, which evaluates the Project's consistency with the Los Angeles Department of Water and Power (LADWP) Urban Water Management Plan (UWMP). The Project's consistency with the Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) is also evaluated in this section and also in Sections IV.B, Air Quality, and IV.G, Greenhouse Gas Emissions, of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

The following describes the primary regulatory requirements regarding land use and planning. Applicable plans and regulatory documents/requirements include the following:

- California Government Code Section 65300 *et seq.*
- Senate Bill 375
- Senate Bill 743
- Southern California Association of Governments 2020–2045 RTP/SCS
- County of Los Angeles River Master Plan
- City of Los Angeles General Plan
- Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan
- Los Angeles Municipal Code
- Citywide Design Guidelines
- River Improvement Overlay

(1) State

(a) California Government Code Section 65302

California law requires that every city and county prepare and adopt a long-range comprehensive general plan to guide future development and to identify the community's environmental, social, and economic goals. As stated in Section 65302 of the California Government Code, "The general plan shall consist of a statement of development policies and shall include a diagram or diagrams and text setting forth objectives, principle, standard, and plan proposals." While a general plan will contain the community vision for future growth, California law also requires each plan to address the mandated elements listed in Section 65302. The mandatory elements for all jurisdictions are land use, circulation, housing, conservation, open space, noise, and safety.

(b) Senate Bill 375

On September 30, 2008, Senate Bill (SB) 375 was instituted to help achieve Assembly Bill (AB) 32 goals to reduce greenhouse gas (GHG) emissions through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) achievement of GHG emission reduction targets for the transportation sector set forth in AB 32. It establishes a process for the California Air Resource Board (CARB) to develop GHG emission reduction targets for each region (as opposed to individual local governments or households). SB 375 also requires Metropolitan Planning Organizations to prepare an SCS within the RTP that guides growth

while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses California Environmental Quality Act (CEQA) streamlining as an incentive to encourage residential or mixed-use residential projects, which help achieve AB 32 goals to reduce GHG emissions.

(c) Senate Bill 743

In September 2013, Governor Edmund G. "Jerry" Brown signed SB 743, which made several changes to CEQA for projects located in areas served by transit. Among other things, SB 743 added Public Resources Code (PRC) Section 21099, which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." PRC Section 21099(a) defines the following:

- "Infill site" means a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses.

- "Transit priority area" means an area within 0.5 mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.

PRC Section 21064.3 defines "major transit stop" as "a site containing either an existing rail or bus rapid transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 20 minutes or less during the morning and afternoon peak commute periods."

(2) Regional

(a) Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy

SCAG is a Joint Powers Authority under California state law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and under state law as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura) and 191 cities in an area covering more than 38,000 square miles. The agency develops long-range regional transportation plans, including sustainable communities strategy and growth forecast components, regional

transportation improvement programs, regional housing needs allocations, and a portion of the South Coast Air Quality management plans.

On April 4, 2024, SCAG's Regional Council adopted the 2024–2050 RTP/SCS. The 2024–2050 RTP/SCS is a long-term plan for the Southern California region that details investment in the transportation system and development in communities to meet the needs of the region both today and in the future. The goals for the 2024–2050 RTP/SCS address mobility, communities, environment and economy, as follows:

- Mobility: Build and maintain an integrated multimodal transportation network.
- Communities: Develop, connect and sustain livable and thriving communities.
- Environment: Create a healthy region for the people of today and tomorrow.
- Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region

The 2024–2050 RTP/SCS also includes growth forecasts through 2050 at the regional, county, and local jurisdictional levels, and Traffic Analysis Zones (TAZ). However, projections at the jurisdiction level or smaller geographies, including TAZ, are utilized to conduct required modeling and generally illustrate how regional policies and strategies may be reflected at the neighborhood level. They are advisory and non-binding. While the 2024–2050 RTP/SCS remains focused on SCAG's core responsibilities and on the requirements of comprehensive regional transportation planning integrated with the development of a SCS, it also encompasses a holistic approach to programs and strategies that support success of the RTP/SCS, such as workforce development, broadband, and mobility hubs. The 2024–2025 RTP/SCS also includes a detailed project list and strategic investments to bridge local plans with overarching performance targets and goals. If fully implemented, the 2024–2050 RTP/SCS would reduce traffic congestion, improve air quality, and improve the region's long-term economic viability through more than $751 billion in transportation investments and a more sustainable regional development pattern.

As part of the 2024–2050 RTP/SCS, SCAG developed a set of Regional Planning Policies to guide decision-making in the region that aligns with the 2024–2050 RTP/SCS's vision and achievement of SCAG's goals. These policies carry forward priorities that have been refined over several planning cycles to promote a multimodal transportation system and sustainable land use and development. These policies address Priority Development Areas (PDAs), housing the region, 15-minute communities, equitable engagement and decision-making, sustainable development, air quality, clean transportation, natural and agricultural lands preservation, and climate resilience. SCAG has identified development within PDAs, providing sufficient housing opportunities, developing 15-minute communities, and fostering equitable decision-making as the framework for implementing the Regional

Planning Policies. The Project's potential to conflict with the relevant policies of the 2024–2050 RTP/SCS is provided further below.

The 2024–2050 RTP/SCS defines PDAs as areas within the SCAG region where future growth can be located to help the region reach 2024–2050 RTP/SCS goals. Generally, this means that people in these areas have access to multiple modes of transportation or that trip origins and destinations are closer together, allowing for shorter trips. PDAs are a technical tool to facilitate plan development and analysis and are used for different purposes, such as growth visioning, performance measurement, or grant applications. As a general principle, development in overlapping PDAs indicates a greater alignment with the goals of the 2024–2050 RTP/SCS. These PDAs are comprised of Neighborhood Mobility Areas (NMAs), Livable Corridors,[1] TPAs,[2] and Spheres of Influence. SCAG also recognizes that many Livable Corridors are also High Quality Transportation Corridors (HQTCs).[3]

(b) LA River Master Plan

The LA River Master Plan, adopted in 2022, builds on this history of planning and includes over two decades of planning and implementation efforts for the Los Angeles River, including efforts by Los Angeles County (1996), the City (2007), the Los Angeles River Ecosystem Restoration Feasibility Study (also known as the ARBOR Study, 2015), the Lower Los Angeles River Working Group (2018), and the Upper Los Angeles River and Tributaries (ULART) Working Group (2019). The County's LA River Master Plan is organized by a series of goals, actions, and methods. Each goal represents an equally important active future priority for the Los Angeles River. These goals include the following:

- Reduce flood risk and improve resiliency.
- Provide equitable, inclusive, and safe parks, open space, and trails.

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[1] *SCAG defines Livable Corridors as areas where local jurisdictions can plan and zone for increased density at nodes along key corridors and redevelop single-story underperforming retail with well-designed, higher-density housing, and employment centers. Growth at strategic nodes along key corridors, many of which are HQTCs, will make transit a more convenient and viable option. The Livable Corridors network is developed utilizing select variables from past plans, such as the HQTCs, and input from local jurisdictions during the Local Data Exchange process. Additionally, this strategy integrates certain transit improvements, including Bus Rapid Transit (BRT), other features improving bus performance and user experience, and certain active transportation improvements to support safe bicycling and walking.*

[2] *In accordance with PRC Section 21099(a)(7), a transit priority area is an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program or applicable regional transportation plan.*

[3] *A high-quality transit corridor is defined in PRC Section 21155(b) as "[a] corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours." The City of Los Angeles defines peak hours as between 6:00 A.M. and 9:00 A.M. and between 3:00 P.M. and 7:00 P.M.*

- Support healthy connected ecosystems.
- Enhance opportunities for equitable access to the river corridor.
- Embrace and enhance opportunities for arts and culture.
- Address potential adverse impacts to housing affordability and people experiencing homelessness.
- Foster opportunities for continued community engagement, development, and education.
- Improve local water supply reliability.
- Promote healthy, safe, clean water.

Note that the City's Los Angeles River Revitalization Master Plan (LARRMP) and River Improvement Overlay District (RIO), discussed below, are identified as one of the four planning overlays within the County LA River Master Plan. In addition, the portion of the area adjacent to the Tujunga Wash within the Project vicinity is also identified as part of the ULART Revitalization Plan Opportunity Areas.

(3) Local

(a) City of Los Angeles General Plan

The City's General Plan,[4] originally adopted in 1974, sets forth goals, objectives, policies, and programs to provide an official guide to the future development of the City, while integrating a range of state-mandated elements,[5] including Land Use, Circulation (Mobility Plan 2035), Housing, Conservation, Open Space, Safety, Noise, and Air Quality. The City's General Plan also includes the Framework Element, the Health and Wellness Element (Plan for a Healthy Los Angeles), the Infrastructure Systems Element, and the Public Facilities & Services Element. Both the City's General Plan land use controls and the goals, objectives, and policies within individual elements of the General Plan include numerous provisions that are intended to avoid or reduce potential adverse effects on the environment. The elements that make up the City's General Plan are described in more detail below. No housing exists

[4] *City of Los Angeles, Department of City Planning, City of Los Angeles General Plan, https://planning.lacity.org/plans-policies/general-plan-overview, accessed January 13, 2025.*

[5] *The term "element" refers to the topics that California law requires to be covered in a general plan (Government Code Section 65302). In addition, State law permits the inclusion of optional elements which address needs, objectives or requirements particular to that city or county (Government Code Section 65303).*

on the Project Site, and the Project does not propose housing. As such, no discussion of the Housing Element is provided below.

(i) Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element) establishes the conceptual basis for the City's General Plan. The Framework Element sets forth a Citywide comprehensive long-range growth strategy and establishes Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. The Framework Element provides guidelines for future updates of the City's community plans and does not supersede the more detailed community and specific plans. No housing exists on the Project Site, and the Project does not propose housing. As such, no discussion of the housing chapter is provided below.

(1) Land Use Chapter

The Framework Element's Land Use Chapter designates Districts (i.e., Neighborhood Districts, Community Centers, Regional Centers, Downtown Center, and Mixed-Use Boulevards) that include standards and policies that shape the scale and intensity of proposed uses with the purpose of supporting the vitality of the City's residential neighborhoods and commercial districts. The establishment of the designated arrangement of land uses and development densities addresses an array of environmental issues, including, but not limited to, reductions in VMT, reductions in noise impacts, improved efficiency in the use of energy, improved efficiency and thus greater service levels within the infrastructure systems, availability of open space, compatibility of land uses, support for alternative modes of transportation, and provision of an attractive pedestrian environment.

(2) Urban Form and Neighborhood Design Chapter

The Framework Element's Urban Form and Neighborhood Design Chapter establishes the goal of creating a city that is attractive to future investment and a city of interconnected, diverse neighborhoods that builds on the strength of those neighborhoods and functions at both the neighborhood and Citywide scales. The purpose of the Urban Form and Neighborhood Design Chapter is two-fold: first, to support the population distribution principles of the Framework Element through proper massing and design of buildings and, second, to enhance the physical character of neighborhoods and communities within the City.[6] The Framework Element does not directly address the design of individual neighborhoods or communities but embodies general neighborhood design and implementation programs that guide local planning efforts and lay a foundation for community

[6] *City of Los Angeles General Plan Framework, p. 5-1, et. seq.*

plan updates. The Urban Form and Neighborhood Design Chapter encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service. The existing and planned transit system provides the opportunity to concentrate development and conserve the existing character of stable neighborhoods.

(3) Open Space and Conservation Chapter

The Framework Element's Open Space and Conservation Chapter provides guidance for overall City provision of open space and sets forth policies for the protection of the City's natural environment resources. The Open Space and Conservation Chapter's objectives are oriented around the conservation of natural resources, provision of outdoor recreational opportunities, minimization of public risks from environmental hazards, and use of open space to enhance community and neighborhood character. Economic, social, and ecological imperatives require the City to take full advantage of all existing open space elements. The ecological dimension is based on the improvement of water quality and supply, the reduction of flood hazards, improved air quality, and the provision of ecological corridors for birds and wildlife.

(4) Economic Development Chapter

The Framework Element's Economic Development Chapter includes goals, policies and objectives that address the appropriate land use locations for development. The Economic Development Chapter also establishes mutual development objectives for land use and economic development. The Economic Development Chapter set forth policies for the development of an infrastructure investment strategy to support population and employment growth areas. The Economic Development Chapter also includes goals, objectives, and policies focused on preserving commercial uses within walking distance to residential areas, and promoting opportunities in areas where growth can be accommodated without encroaching on residential neighborhoods. It also focuses on establishing a balance of land uses that provide for commercial and industrial development, which meet the needs of local residents, sustain economic growth, and assure maximum feasible environmental quality.

(5) Transportation Chapter

The Framework Element's Transportation Chapter includes proposals for major improvements to enhance the movement of goods and to provide greater access to major intermodal facilities. While the focus of the Transportation Chapter is on guidance for transportation investments, the Transportation Chapter also includes goals, policies, and objectives that overlap with policies included in other chapters of the Framework Element regarding land use patterns and the relationship of the pedestrian system to arrangement of land uses. The Transportation Chapter is implemented through the General Plan's Mobility

Plan 2035 (Mobility Plan), which is a comprehensive update of the General Plan Transportation Element.

(6) Infrastructure and Public Services Chapter

The Framework Element's Infrastructure and Public Services Chapter addresses infrastructure and public service systems, including wastewater, stormwater, water supply, solid waste, police, fire, libraries, parks, power, schools, telecommunications, street lighting, and urban forests. For each of the public services and infrastructure systems, basic policies call for monitoring service demands and forecasting the future need for improvements, maintaining an adequate system/service to support the needs of population and employment growth, and implementing techniques that reduce demands on utility infrastructure or services. Generally, these techniques encompass a variety of conservation programs (e.g., reduced use of natural resources, increased site permeability, watershed management, and others). Strategic public investment is advocated in the Infrastructure and Public Services Chapter as a method to stimulate economic development, as well as maintain environmental quality. Attention is also placed on the establishment of procedures for the maintenance and/or restoration of service after emergencies, including earthquakes.

(ii) Mobility Plan 2035

The Mobility Plan, adopted on January 20, 2016, and readopted September 7, 2016, is a comprehensive update of the General Plan Transportation Element. The Mobility Plan provides the policy foundation for achieving a transportation system that balances the needs of all road users, incorporates "complete streets" principles and lays the policy foundation for how future generations of Angelenos interact with their streets, in compliance with the Complete Streets Act (AB 1358).

The purpose of the Mobility Plan is to present a guide to the future development of a Citywide transportation system for the efficient movement of people and goods. While the Mobility Plan focuses on the City's transportation network, it complements other components of the General Plan that pertain to the arrangement of land uses to reduce VMT and policies to support the provision and use of alternative transportation modalities. The Mobility Plan includes the following five main goals that define the City's high-level mobility priorities:

- Safety First;
- World Class Infrastructure;
- Access for All Angelenos;
- Collaboration, Communication, and Informed Choices; and

- Clean Environments and Healthy Communities.

(iii) Conservation Element

The City of Los Angeles General Plan includes a Conservation Element, which addresses the preservation, conservation, protection, and enhancement of the City's natural resources. Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes an objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes and a corresponding policy to continue protecting historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities. The Conservation Element refers to the Open Space Element for a discussion of open space aspects of the City, including park sites.

(iv) Health and Wellness Element (Plan for a Healthy Los Angeles)

The Plan for a Healthy Los Angeles, the Health and Wellness Element of the City's General Plan, provides high-level policy vision, along with measurable objectives and implementation programs to elevate health as a priority for the City's future growth and development.[7] Through a new focus on public health from the perspective of the built environment and City services, the City seeks to achieve better health and social equity through its programs, policies, plans, budgeting, and community engagement. The plan acknowledges the relationship between public health and issues, such as transportation, housing, environmental justice, and open space, among others. The plan includes *Chapter 5, An Environment Where Life Thrives*, which identifies the following environmental policies:

- Reduce air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health.
- Reduce negative health impacts for people who live and work in close proximity to industrial uses and freeways through health promoting land uses and design solutions.
- Protect communities' health and well-being from exposure to noxious activities (for example, oil and gas extraction) that emit odors, noise, toxic, hazardous, or contaminant substances, materials, vapors, and others.
- Explore opportunities to continue to remediate and redevelop brownfield sites.

[7] *Plan for a Healthy Los Angeles, A Health and Wellness Element of the General Plan, 2015.*

- Increase the city's resilience to risks (increasing temperatures and heat related effects, wildfires, reduced water supply, poor air quality, and sea level rise) resulting from climate change.

- Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution.

Included in this General Plan element are policies pertaining to the arrangement of land uses within the City related to public health hazards, and which reinforce other State, regional, and local policies that call for improvements to air quality, reducing GHGs, protection from hazards and hazardous materials, and reductions in vehicle trips.

(v) Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan

The City's 1998 Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan (Community Plan), which covers the neighborhoods of Sherman Oaks, Studio City, Toluca Lake, and Cahuenga Pass, is the land use element of the General Plan applicable to the Community Plan Area. The Community Plan implements the Framework Element and includes land use designations, density limits, building heights and other provisions to implement the development that supports the City's policies and development vision for the future. Sixteen primary goals and associated objectives and policies are identified in the Community Plan that address issues such as long-term stability, community character, transportation, fire protection and police services.

It is noted that the City is currently updating the Community Plan.[8] However, because the update is not yet adopted, the existing version of the Community Plan, adopted in 1998, is used for the purpose of this analysis.

(b) Los Angeles Municipal Code

All development activity on the Project Site is subject to the City of Los Angeles Municipal Code (LAMC), particularly Chapter 1, General Provisions and Zoning, also known as the City of Los Angeles Planning and Zoning Code. The LAMC defines the range of zoning classifications throughout the City, provides the specific permitted uses applicable to each zoning designation, and applies development regulations to each zoning designation.

[8] *City of Los Angeles. Community Plan Updates, https://planning.lacity.gov/community-plan-update/southeast-valley, accessed January 13, 2025.*

(c) Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the Framework Element's urban design principles and are intended to be used by City of Los Angeles Department of City Planning staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant policies from the Framework Element and Community Plans. By offering more direction for proceeding with the design of a project, the Citywide Design Guidelines illustrate options, solutions, and techniques to achieve the goal of excellence in new design. The Citywide Design Guidelines, which were initially adopted by the City Planning Commission in July 2013 and updated in October 2019, are intended as performance goals and not zoning regulations or development standards and, therefore, do not supersede regulations in the LAMC. The guidelines "carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions" and are organized in relation to Pedestrian-First Design, 360 Degree Design, and Climate-Adapted Design. The Citywide Design Guidelines incorporate the goals of the previous Walkability Checklist and interact with other guidelines such as those found in Community Design Overlays.

(d) River Improvement Overlay

An overlay is an additional layer of planning control applied to properties in a clearly defined geographic area. Overlays function as tailored zoning districts, each with its own specialized set of regulations. Overlays implement the City's General Plan and Community Plans through neighborhood-specific policy objectives, supplementing the underlying base zoning. Projects located in an overlay must demonstrate compliance with all applicable regulations.

Effectuated by Ordinance No. 183,145 in August 2014, the River Improvement Overlay (RIO) District enables the City of Los Angeles to better coordinate land use development along the 32-mile corridor of the Los Angeles River that flows within the City's boundaries. The RIO District is a proposed special use district that requires new development projects to follow and implement applicable development regulations and design guidelines. The purposes of the RIO District are to support the goals of the City's LARRMP; contribute to the environmental and ecological health of the City's watersheds; provide native habitat and support local species; establish a positive interface between the Los Angeles River and adjacent properties; promote pedestrian, bicycle and other multi-modal connections between the river and surrounding neighborhoods; provide an aesthetically pleasing environment; provide safe, convenient access to and along the river; promote river identity; and support the City's stormwater ordinances and programs.

b. Existing Conditions

(1) Project Site

As discussed in Section II, Project Description, of this Draft EIR, the existing Project Site supports a variety of media and production uses focused on the creation, development, recording, broadcasting, and editing of recorded and live television programming, live audience productions, feature films, and other audio, visual, and digital media. The Project Site is generally bounded by the Los Angeles River and Tujunga Wash[9] to the north and east, Colfax Avenue to the east, a public alley of varying width, from approximately 28 feet to 30 feet, to the south with various commercial uses across the alley fronting Ventura Boulevard, and Radford Avenue to the west. The North Lot and the South Lot are bisected by the Los Angeles River. The Project Site is currently improved with 1,179,110 square feet of studio-related uses, including 359,730 square feet of sound stages; 255,510 square feet of production support; 450,060 square feet of production office; and 113,810 square feet of general office.

The Project Site perimeter is enclosed with chain link, wrought iron, or combination block wall/chain link fencing, some of which is lined with trees, shrubs, and climbing vines, and segments of which include green screening. Additional landscaping within the Project Site interior includes trees and shrubs, and some of the parking areas include landscaped infiltration basins. Street trees are also located along Radford Avenue.

The Project Site is located in the City's Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan area. As shown in Figure IV.J-1 on page IV.J-14, the Project Site includes General Plan land use designations of Light Industrial for the North Lot, Light Manufacturing for the South Lot, and Open Space for the Tujunga Wash and Los Angeles River portions. As shown in Figure IV.J-2 on page IV.J-15, the North Lot is zoned [Q]MR2-1L-RIO (subject to a "Q" Qualified Classification, 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 Q conditions on the site vary by zoning designation and lot. Within the South Lot, the Q condition attached to the M2-1 Zone (included within Ordinance Nos. 172,446 and 168,218) limits its use to motion picture and/or television production and related uses. Within the North Lot, the Q condition attached to the MR2-1L Zone (included within Ordinance

[9] *The Tujunga Wash is a tributary of the Los Angeles River and runs along the eastern boundary of the North Lot.*



LEGEND

RESIDENTIAL

- Very Low / Very Low I Residential
- Low / Low I Residential
- Low Medium / Low Medium I Residential
- Medium Residential
- High Medium Residential

COMMERCIAL

- Limited Commercial
- Community Commercial
- Neighborhood Office Commercial
- General Commercial

INDUSTRIAL

- Ligtht Manufacturing
- Light Industrial

OPEN SPACE / PUBLIC FACILITIES

- Open Space

Figure IV.J-1
Land Use Designations on the Project Site

Source: ZIMAS, 2024.



LEGEND

GENERALIZED ZONING

OS	C1, C2	PF
RE, R1	MR, M2	
RD, R3, R4, RAS	P	

Figure IV.J-2
Zoning Designations on the Project Site

Source: ZIMAS, 2024.

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 a 75,428-square-foot office building, 11,325 square feet of stage area, and 75,132 square feet of technical production and support studios. These conditions also include a minimum number of parking spaces, buffers, setbacks, fencing, door size limits, and access limitations.

As identified by ZIMAS, the Project Site is also located within a TPA as well as within the boundaries of the River Improvement Overlay District. Additionally, as shown in Map 3.4 of the 2024–2050 RTP/SCS, the Project Site is located within a Livable Corridor and within a NMA. The Project Site is also located within a HQTC

(2) Surrounding Uses

The Project Site is located in an urbanized area that is developed with a mix of land uses. Ventura Boulevard, the major arterial in the immediate vicinity of the Project Site, is lined with commercial, institutional, and residential uses. Other major arterials in the Project Site vicinity include Laurel Canyon Boulevard, Moorpark Street, and Colfax Avenue, which are all generally lined with medium- to high-density multifamily residential uses and commercial uses. Immediately west of the South Lot across Radford Avenue is a four-story apartment complex, an automobile repair shop, and a single-story, single-tenant restaurant building. To the west and south of the South Lot is a six-story office building located along Radford Avenue and Ventura Place. Further west of the South Lot is a neighborhood of several multi-family residential developments. Immediately west of the North Lot across Radford Avenue are various one-, two-, and three-story low- and medium-density single- and multi-family residential developments. Further west of the North Lot is a neighborhood of several single-family residential developments. Low- and mid-rise commercial buildings and mini shopping centers occupied by general office uses, restaurants, retail uses, automobile repair shops, motels, and government uses are located south of the Project Site, across the abutting public alley and fronting Ventura Boulevard. Properties along the southern side of Ventura Boulevard are improved with similar uses. Further to the south beyond Ventura Boulevard are three- and four-story multifamily residential buildings and Carpenter Community Charter School. To the north and east, the Project Site is bounded by the Tujunga Wash and Los Angeles River, respectively, which provide approximately 97-foot to 150-foot buffers from the neighborhoods across those channels. Many of the streets in the vicinity of the Project Site are lined with street trees, and the major arterials exhibit substantial commercial signage, including multiple large double-faced, off-site billboard signs along Ventura Boulevard.

3. Project Impacts

a. Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the Project would have a significant impact related to land use if it would:

Threshold (a): Physically divide an established community; or

Threshold (b): Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

As discussed further below, the Initial Study prepared for the Project, and included as Appendix A of this Draft EIR, determined that the Project would result in a less-than-significant impact related to the Project's potential to physically divide an established community (Threshold (a)). For the remaining threshold, the Appendix G Thresholds provided above are relied upon. The analysis utilizes factors and considerations identified in the City's *2006 L.A. CEQA Thresholds Guide*, as appropriate, to assist in answering the Appendix G Threshold questions.

The *L.A. CEQA Thresholds Guide* identifies the following factors to evaluate impacts related to land use consistency:

- Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site; and
- Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.

b. Methodology

The determination of consistency with applicable land use policies and ordinances is based upon a review of the previously identified planning and zoning documents that were adopted to mitigate or avoid an environmental effect. CEQA Guidelines Section 15125(d) requires that an EIR discuss any inconsistencies with applicable plans. A conflict between a project and an applicable plan is not necessarily a significant impact under CEQA unless the inconsistency will result in an adverse physical change to the environment that is a "significant environmental effect" as defined by CEQA Guidelines Section 15382. Specifically, as provided in Continuing Education of the Bar, Practice Under the California Environmental Quality Act, Section 12.34:

> *… [I]f a project affects a river corridor, one standard for determining whether the impact is significant might be whether the project violates plan policies protecting the corridor; the environmental impact, however, is the physical impact on the river corridor.*

An analysis of conflicts and consistency with applicable goals, objectives, and policies of the General Plan, including the Framework Element, Mobility Plan, Conservation Element, Health and Wellness Element (Plan for a Healthy Los Angeles), and the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan; LAMC (Zoning Code); and Citywide Design Guidelines is discussed in the impact analysis below and Appendix K. Under State Planning and Zoning law (Government Code Section 65000, et seq.), strict conformity with all aspects of a plan is not required. Generally, plans reflect a range of competing interests, and agencies are given great deference to determine consistency with their own plans. As discussed in the Office of Planning and Research (OPR) State of California General Plan Guidelines (2017), a proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct other policies. More specifically, a project is considered consistent with the provisions and general policies of an applicable City or regional land use plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. Further, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, State law does not require an exact match between a project and the applicable general plan. Rather, to be "consistent," the project must be "compatible with the objectives, policies, general land uses, and programs specified in the applicable plan," meaning that a project must be in "agreement or harmony" with the applicable land use plan to be consistent with that plan, but need not be in perfect conformity with every plan policy.[10]

c. Project Design Features

No specific project design features are proposed with regard to land use and planning. However, specific Project elements that are especially relevant to this land use analysis are described below.

(1) Radford Studio Center Specific Plan

The Project would establish the Radford Studio Center Specific Plan (Specific Plan) to allow for the continuation of an existing studio use and the modernization and expansion of media production facilities within the approximately 55-acre Project Site. The proposed Specific Plan would establish standards to regulate land use, massing, design, and development, and permit up to 2,200,000 square feet of sound stage, production support,

[10] *Sequoyah Hills Homeowners Association v. City of Oakland (1993) 23 Cal.App.4th 704, 719.*

production office, general office, and retail uses within the Project Site upon build out, as well as associated ingress/egress, circulation, parking, landscaping, and open space improvements. Specifically, the proposed Specific Plan would permit up to 1,667,010 square feet of new development, the retention of 532,990 square feet of existing uses,[11] and the demolition of up to 646,120 square feet of existing uses. Buildout under the proposed Specific Plan could take place in one or multiple phases and is anticipated to be completed as early as 2028 or as late as 2045.[12] The proposed Specific Plan would establish standards to regulate land use, massing, design, and development within the Project Site while allowing for flexibility to accommodate potential changes in technology or space requirements that are inherent to the pace of advancement in entertainment technology. Accordingly, the proposed Specific Plan would allow for the exchange of two of the permitted studio land uses and associated floor areas in order to respond to the future needs and demands of the entertainment industry. Specifically, floor area from any permitted land use category may be exchanged for additional sound stage and production support uses as long as the limitations of the proposed Specific Plan are met, provided that the maximum permitted floor area of 2,200,000 square feet is not exceeded, as described further below. The primary development regulations set forth in the Radford Studio Center Specific Plan would address land use, design, historic regulations, childcare, alcohol sales, and parking, as well as associated implementation procedures. The Conceptual Site Plan provided in Figure II-7 in Section II, Project Description, of this Draft EIR illustrates the proposed development program included in Table II-1 in Section II, Project Description, of this Draft EIR.

(a) Permitted Land Uses

The proposed Specific Plan would permit five uses: sound stage, production support, production office, general office, and retail (consistent with the Neighborhood Retail uses permitted under LAMC Section 13.07 C) and ancillary and related uses that support the studio and the five permitted land uses and ancillary uses as defined in the proposed Specific Plan. These five uses would provide and support several production-related uses. These include such uses as motion picture, television, and broadcast studios and related incidental facilities, including, but not limited to, production activity areas; indoor and outdoor stages; sets and façades; digital, film, video, audio, video game, eSports, and media production areas; recording and broadcasting studios; sound labs; film editing studios; film video and

[11] *Per the proposed Radford Studio Center Specific Plan, floor area shall be defined in accordance with Los Angeles Municipal Code (LAMC) Section 12.03, with the following exceptions: areas related to the Mobility Hubs; basecamp; outdoor eating areas (covered or uncovered); trellis and shade structures; covered walkways and storage areas; and all temporary uses (e.g. sets/façades) shall not be counted towards floor area. Per the Radford Studio Center Specific Plan definition, the maximum of 2,200,000 square feet of total floor area within the Project Site upon buildout of the Project is equivalent to approximately 2,345,000 square feet based on the LAMC definition.*

[12] *Construction of the proposed Radford Bridge (also referred to as the Moorpark Bridge), extending from the northern terminus of Radford Avenue north across the Tujunga Wash to Moorpark Street, may be completed after 2028.*

audio processing areas; sets and props production areas; computer design and graphics studios; animation studios; and ancillary facilities related to those activities. Other related uses and facilities that would also be permitted, as detailed in the proposed Specific Plan, include basecamps; communication facilities; conference rooms (ancillary to office uses); modular offices and trailers; studio support facilities; parking; various ancillary commercial and retail uses to serve the onsite employees and visitors; catering facilities; areas for special events; audience and entertainment shows; live audience productions; museum exhibits and theater facilities that support production activities; childcare (ancillary to office uses) for on-site employees and visitors; fitness facilities (ancillary to office uses) for on-site employees and visitors; emergency medical facilities to serve the on-site employees and visitors; infrastructure, maintenance and storage facilities; mills/manufacturing areas, sleeping quarters for on-site personnel (sleeping quarters would not be located within the lower level used for parking, basecamp areas, and the Mobility Hubs); recreational facilities for on-site users; restaurants and special event areas, including the sale of alcoholic beverages; security facilities; signs; and storage. Consistent with existing conditions, pyrotechnic special effects would be used and stored in accordance with existing applicable regulatory requirements.

(b) Land Use Exchange

As previously noted, the proposed Specific Plan would allow for limited exchanges between certain permitted studio land uses and associated floor areas. Specifically, the floor area from any permitted land use could be exchanged for additional sound stage and/or production support uses as long as the limitations of the proposed Specific Plan are met. In addition, the total permitted floor area on-site would not exceed 2,200,000 square feet. The permitted adjustments would be limited by the Specific Plan as follows:

- The total sound stage floor area may be increased from 450,000 square feet up to a total of 575,000 square feet in exchange for equivalent decreases in the floor area of other uses.
- The total production support floor area may be increased from 300,000 square feet up to a total of 575,000 square feet in exchange for equivalent decreases in the floor area of other uses.
- The total permitted floor area for production office uses would not exceed 725,000 square feet.
- As the exchange in floor area is only limited to the sound stage and production support uses as described above, the total permitted floor area for production office uses would not exceed 725,000 square feet, the total permitted floor area for general office uses would not exceed 700,000 square feet, and the total permitted floor area for retail uses would not exceed 25,000 square feet.

Specific proposals for development that involve a land use exchange would require discretionary approval by the Department of City Planning. This process would entail a determination of whether the individual proposal complies with the regulations, guidelines, and mitigation measures set forth in the proposed Specific Plan and the Project's Mitigation Monitoring Program.

(c) Height Subareas

The proposed Specific Plan would establish height subareas (Subareas A through D) with specified height limits and limited height allowances to regulate building heights throughout the Project Site. Except for Subarea A, which would establish a more restrictive 60-foot height limit, the Project Site would be subject to a sitewide height limit of 75 feet as measured from Project Grade (i.e., 595 feet above mean sea level (AMSL) for the North Lot and 610 feet AMSL for the South Lot).[13] This height limit would be augmented with additional height allowances permitted in a limited portion of Subareas B and C. Each of the subareas is decribed below and summarized further in Table II-2 in Section II, Project Description, of this Draft EIR.

- Subarea A—60-Foot Height Limit: Buildings in the southwestern portion of the South Lot would be subject to a height limit of 60 feet.
- Subarea B—75-Foot Height Limit: The areas along the northwestern, eastern, and southern boundaries of the South Lot would be subject to a height limit of 75 feet. Buildings up to a maximum of 95 feet in height would be permitted in up to 30 percent of Subarea B.
- Subarea C—75-Foot Height Limit: The center of the South Lot would be subject to a height limit of 75 feet. Buildings up to a maximum of 135 feet in height would be permitted in up to 30 percent of Subarea C.
- Subarea D—75-Foot Height Limit: The entirety of the North Lot would be subject to a height limit of 75 feet.

The height subareas and associated setbacks and stepbacks (discussed below) would limit future development to concentrate building height toward the center of the Project Site and away from the existing commercial and residential uses, as well as the Los Angeles River and the Tujunga Wash. Further, a 20-foot stepback from the property line of the South Lot along Radford Avenue, Colfax Avenue, and the public alley would be required for any new building that exceeds 75 feet in height. Any building or structure, except for historical

[13] *Based on height measured from Project Grade, which is defined as 595 feet AMSL for the North Lot and 610 feet AMSL for the South Lot. Using the LAMC definition of building height, heights would range between approximately 60 feet and 140 feet.*

resources, may also be demolished and replaced with a new building or structure that would not exceed the square footage set forth in the proposed Specific Plan and subject to the approval process detailed therein. Note that the height zones do not represent the actual development footprint of Project buildings. Rather, new buildings would occupy only a limited portion of the development envelope permitted in each subarea.

(d) Design Regulations

(i) Setbacks

New development within the Project Site would be subject to setback requirements, as set forth in the proposed Specific Plan. Setback areas would function as buffers and transitional space around the Project Site perimeter. Within these areas, features, such as security kiosks, fences, walls, projections, stairs, balconies, landscaping, access and circulation areas, parking, basecamp, etc., would be permitted. The proposed setback areas are described below.

- Radford Avenue: A 17-foot-wide setback would be provided along the entire western edge of the North Lot. A 10-foot-wide setback would be provided along the western edge of the South Lot.
- Colfax Avenue: A 15-foot-wide setback would be provided along the southeastern edge of the South Lot.

Additionally, as previously described, the Project Site is bounded by the Los Angeles River and Tujunga Wash to the north and east, which serve as approximately 97-foot to 150-foot buffers from uses across those channels. These existing buffers would be maintained as part of the Project.

(ii) Stepbacks

New development within the Project Site would be subject to stepbacks as set forth in the proposed Specific Plan. Stepbacks are an architectural tool to reduce building massing and vary building forms by pulling the façade of upper stories back from the building edge at a predetermined elevation above Project Grade. The proposed stepbacks are described below.

- Radford Avenue: A 20-foot stepback would be provided for any building within Height Zone B that exceeds 75 feet in height.
- Colfax Avenue: A 20-foot stepback would be provided for any building within Height Zone B that exceeds 75 feet in height.

- Southern Alley: A 20-foot stepback would be provided for any building within Height Zone B that exceeds 75 feet in height.

(iii) Other Design Elements

The proposed Specific Plan would also include design standards that address the screening of rooftop equipment and outdoor storage areas, fencing, parking structure design, and Project Site access. In particular, rooftop equipment and outdoor storage areas that are visible from public pedestrian locations within 500 feet of the Project Site perimeter would be screened with vegetated walls, fences, trellises, graphic treatments, other structures, or other approved measures. Screening of satellite dishes located at grade or on rooftops would not be required, consistent with existing conditions. Fencing or perimeter walls of up to eight feet in height would be permitted on-site, and chain link fencing without inserts or secondary screening (such as fabric or panels) and barbed wire fencing would be prohibited. Fencing would be maintained in a clean and well-kept manner, including through the repair of broken walls and removal of graffiti, and improved with either low maintenance landscaping, hardscape, or a combination of both. The Project would include more visually transparent fencing along the southwestern corner so that the Radford Gate would be visible.

With regard to above-grade parking structures, the proposed Specific Plan would set forth design standards regarding the following: the height of enclosure walls, which must effectively block light emitted on a horizontal plane from the structure; the location of vehicular entrances and exits so as to minimize interference with pedestrian and vehicular traffic on the adjacent streets; screening of any new public right-of-way-facing parking structure façades along Radford Avenue or Colfax Avenue, with architectural articulation, landscaping including vegetated walls and vertical gardens, and/or use of compatible building materials; and the lighting and screening of rooftop parking with a parapet wall and light source shielding.

(e) Parking

The proposed Specific Plan would establish parking ratios for the permitted land uses (sound stage, production support, production office, general office, and retail uses), ranging from two to three parking spaces per 1,000 square feet of floor area, for a sitewide total of approximately 6,050 parking spaces upon full buildout of the Project. Non-occupiable structures, such as sets/façades, kiosks, and parking/entry facilities would not provide dedicated parking. Vehicles could be parked in tandem (double or triple) or by valet, depending on the specific parking layout. In addition, the proposed Specific Plan would set forth a process for approval and implementation of a reduced/shared parking plan (i.e., fewer than 6,050 spaces), so long as an adequate parking supply is maintained. Ultimately, parking may be located in a combination of above-ground structures, subterranean structures, and/or surface spaces at any location within the Project Site provided the proposed Specific Plan's parking requirements are met.

(2) Sign District

The proposed Radford Studio Center Sign District (Sign District) would regulate signage, in conjunction with applicable LAMC signage provisions, in terms of placement, scale, color, illumination, and material. Project signage would be integrated with and complement the overall aesthetic character of on-site development and would be designed to both enhance the studio character of the Specific Plan area. Project signage could include general ground level and wayfinding pedestrian signage around the Project Site perimeter, architectural ledge signs, digital displays, illuminated architectural canopy signs, information signs, pillar signs, pole signs, projecting signs, supergraphics, window signs, building identification signs, marquee and monument signs, large-format screens, and other sign types such as on-site wall signs that are typical on studio campuses. The proposed Sign District would regulate the permitted number of signs, sign type, sign height, and the maximum area of signage permitted along each public street frontage. These limitations would not apply to interior signs[14] that generally are not visible from off-site, public rights-of-way, or any publicly accessible plaza adjacent to a public right-of-way. A number of sign types would be prohibited throughout the Project Site, including off-site signs (i.e., billboards), and exterior-facing digital displays would also be prohibited. Prohibited sign types would also include those that contain obscene matters, as defined in Section 311 of the State Penal Code; those that contain or consist of posters, pennants, banners, ribbons, streamers, or spinners, except as permitted by the LAMC; and those that contain flashing, mechanical, or strobe lights in conflict with the provisions of LAMC Sections 80.08.4 and 93.0107. Project signage may include both externally and internally lit signs, and LAMC illumination regulations would apply. Externally visible signage along the Project Site perimeter and signage within the Project Site interior are described further below.

A total of up to approximately 41,704 square feet of Exterior Signage that is externally visible is proposed to be located within the Project Site. In addition to the signage along the Tujunga Wash, Los Angeles, River and Colfax Avenue, the proposed Sign District would include up to 59,400 square feet of mural, graphics, art installations, or other non-sign graphics along the external facing wall of the sound stages. Signage anticipated to be located along the exterior would include Supergraphic Signs, as well as those typically allowed under the LAMC (e.g., wall signs, architectural ledge signs, illuminated architectural canopy signs, roof signs, and window signs). Digital displays would be prohibited along the Project Site exterior.

Interior Signage is signage that is internal to the Project Site and would not be generally externally visible. These signs would not be located directly along and facing a public right-of-way and would be located in excess of 100 feet from public rights-of-way (i.e.,

[14] *"Interior" refers to approximately 100 feet from Project Site edges.*

Radford Avenue, the alley parallel to Ventura Boulevard and the combined perimeter along Colfax Avenue, the Los Angeles River, and the Tujunga Wash). Interior signage, such as wall signs, architectural ledge signs, illuminated architectural canopy signs, roof signs, and window signs, shall be regulated in keeping with the LAMC with the clarification that the proposed Sign District modified the term "streets" (as referenced in the LAMC) such that it shall also include public rights-of-way, as well as internal streets, pedestrian passageways/ paseos and courtyards, driveways, and/or private drives (including, but not limited to, the alley at the southern boundary of the Project Site). This cumulative permitted sign area for the aforementioned signs may be utilized anywhere within the interior boundaries of the Sign District. While Digital displays would be prohibited along the Project Site exterior they would be allowed within the Project Site interior. No deviation has been requested for the typical signage illumination criteria identified in LAMC Section 14.4.4. within the Project Site interior.

(3) Project Approvals

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

- A General Plan Amendment to the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan to: (a) change the land use designations for the portions of the Project Site from Light Industrial to Regional Commercial; (b) add a new footnote to the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, establishing the Radford Studio Center (RSC) Specific Plan as the land use regulatory document for the Project Site and to include the RSC Zone as a corresponding zone to the Regional Commercial land use designation; a General Plan Amendment to the Transportation Element (Mobility Plan 2035) to (a) modify the street designation of Radford Avenue from "Avenue II" to "Modified Avenue II" and (b) Modify the street designation of Colfax Avenue from "Avenue II" to "Modified Avenue II.";

- A Vesting Zone Change and Height District Change from [Q]MR2-1L-RIO and [Q]M2-1-RIO to the RSC-RIO Zone, and a corresponding Code Amendment to add the RSC Zone to the LAMC;

- The establishment of a Specific Plan to regulate development within the Project Site;

- The establishment of a Sign District (-SN Supplemental Use District) to regulate signage within the Project Site;

- A Development Agreement between the Applicant and the City of Los Angeles for a term of 20 years; and

- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading

permits, excavation permits, foundation permits, building permits, sign permits, and off-site permits and approvals related to the proposed Radford Bridge.

d. Analysis of Project Impacts

Threshold (a): Would the Project physically divide an established community?

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study for the Project, which is included as Appendix A of this Draft EIR, the Project would not divide an established community. As previously discussed, the Project Site is currently developed with Radford Studio Center and is located in an urbanized area that is developed with a mix of land uses. The major arterials in the Project vicinity, including Ventura Boulevard, Laurel Canyon Boulevard, Moorpark Street, and Colfax Avenue, are lined with medium- and high-density multi-family residential uses and commercial uses. The organization of such developed uses is defined by the existing street grid, with residential uses concentrated along side streets.

The Project includes the continuation of the existing studio use and the redevelopment of portions of Radford Studio Center with new studio facilities, as well as associated circulation improvements, parking facilities, landscaping, and open space. These uses would be consistent with the existing on-site uses, as well as other commercial developments located adjacent to and in the general vicinity of the Project Site. Additionally, all proposed development would occur within the boundaries of the Project Site and would not include the permanent closure of any surrounding travel routes. Furthermore, the Project Site and vicinity are in a previously developed area, and the Project does not propose a freeway or other large infrastructure that could divide the existing surrounding community. Access to all surrounding properties would continue to be available upon buildout of the Project. **Therefore, as determined in the Initial Study, the Project would not physically divide an established community. As such, impacts with respect to Threshold (a) would be less than significant. No further analysis is required.**

Threshold (b): Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

(1) Impact Analysis

(a) 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (2024–2050 RTP/SCS)

The Project's potential to conflict with the applicable Regional Planning Policies set forth in the 2024–2050 RTP/SCS is analyzed in Table 1 of Appendix K of this Draft EIR. As detailed therein, the Project generally would not conflict with the applicable Regional

Planning Policies set forth in the 2024–2050 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. In particular, the Project would support the 2024–2050 RTP/SCS Regional Planning Policies regarding complete streets through implementation of the Radford Bridge that would provide new pedestrian and bicycle connections, a new Class IV protected bikeway along Radford Avenue, and the implementation of Mobility Hubs. The Project would also comply with all design element requirements, which may affect public rights-of-way, including proper driveway alignment, sidewalk widths to the extent feasible, improved lighting elements, and landscaping design, that do not hinder sight distance, mobility, or accessibility. Furthermore, the Project Site is also well-served by public transit options.

With regard to the Regional Planning Policies addressing TDM, as described in Table 1 of Appendix K, the Project's Mobility Hubs would support multi-modal mobility options, first-mile/last-mile connections, and other TDM strategies. As discussed in Section IV.M, Transportation, of this Draft EIR, the Project would provide a TDM Program, including educational programs/on-site coordinators, Mobility Hubs with a transportation information center/kiosks, bicycle parking and amenities, pedestrian amenities, a ride-share matching and carpool/vanpool program, as well as carpool/vanpool parking and loading, neighborhood enhancements, shuttle service, local transit infrastructure improvements, and a Guaranteed Ride Home Program. The Mobility Hubs would be located at the northernmost point of the North Lot and adjacent to the Mack Sennett building within the South Lot. The Mobility Hubs would support first-mile/last-mile connections; encourage employee use of public transit, carpooling, vanpooling, and biking/scootering to work; and support other TDM strategies. The Mobility Hubs would provide an off-street space for passenger pick-up/drop-off and the temporary parking of buses, carpools, vanpools, shuttles, ride-share, taxi, and other commercial and non-commercial vehicles. The Mobility Hubs would also include space to accommodate support uses, storage, maintenance, staging facilities, bike share, and ridership amenities.

In support of the Regional Planning Policies related to transportation safety, the Project's pedestrian and bicycle improvements would not preclude any future Vision Zero safety improvements by the City. Furthermore, the Project would enhance pedestrian and bicycle safety with improvements, such as wider pedestrian areas along the Project Site frontages, a new Class IV bikeway along Radford Avenue, and enhanced public access to the Los Angeles River and Tujunga Wash via the Radford Bridge.

As discussed above, the Project Site is located within an NMA, Livable Corridor, and HQTC. As such, the Project Site is located within an overlapping PDA. As discussed above, development in overlapping PDAs indicates a greater alignment with the goals of the 2024–2050 RTP/SCS. In addition, as described in Table 1 of Appendix K, the Project's features, including the Mobility Hubs, Radford Bridge, Class IV protected bikeway along Radford

Avenue, bicycle parking, EV charging stations, and TDM program, would support the specific Regional Plan Policies related to PDAs.

In support of the Regional Planning Policies regarding sustainable development, the Project would incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and the CALGreen Code. As described in more detail in Table 1 of Appendix K, the Project would be designed to meet LEED Gold or equivalent requirements and would meet the requirements of the City's All-Electric Buildings Ordinance (Ordinance No. 187,714), as applicable. In addition, both in compliance with and in exceedance of LAMC requirements, a number of specific sustainable design components would be incorporated into the Project.

The Regional Planning Policies also address reducing GHG emissions and improving air quality (Policy 51), as well as reducing the exposure and impacts of emissions to vulnerable communities (Policy 52). As discussed in Section IV.B, Air Quality, of this Draft EIR, Project construction would result in a potentially significant Project-level and cumulative impact related to regional NO_X emissions, even with the incorporation of feasible mitigation measures. Although temporary, this impact would be significant and unavoidable and the Project would result in a partial conflict with Policy 51. Impacts related to all other criteria air pollutants and GHG emissions would be less than significant. In addition, operation of the Project would not result in any significant regional or localized air quality impacts. Thus, operation of the Project would not conflict with the Regional Planning Policies related to air quality. In addition, construction and operation of the Project would not result in air quality impacts to vulnerable populations, such as Priority Equity Communities and the AB 617 Communities.[15] Generally, given that land use plans reflect a range of competing interests, a project should be compatible with a plan's overall goals and objectives but need not be in perfect conformity with every plan policy.

The Regional Planning Policies also address natural and agricultural lands preservation. As discussed in Table 1 of Appendix K, the Project would not conflict with these policies as the Project Site is located within an urbanized area, is currently developed with media and production uses, and does not contain any large expanses of open space, natural resources, or agricultural land.

Policies regarding climate resilience are also included in the Regional Planning Policies. As described in Table 1 of Appendix K, the Project would not conflict with these policies. In particular, the Project is located within a PDA (i.e., a Livable Corridor and NMA),

[15] *As defined by SCAG, Priority Equity Communities are census tracts with a greater concentration of populations that have been historically marginalized and are susceptible to inequitable outcomes based on several socioeconomic factors. AB 617 Communities are disadvantaged communities that are disproportionately affected by air pollution.*

where development is targeted. In addition, the Project includes numerous TDM features to reduce GHG emissions. In addition, the Project is located within a TPA. Furthermore, the Project would comply with regulations related to hazards, including those related to seismic hazards, flooding, and fires. In addition, the Project would implement numerous water conservation features beyond those required by code, and LADWP has determined that its current and projected available water supplies for normal, single-dry, and multiple-dry years would be sufficient to meet the Project's water demand in addition to the existing and planned future water demands within its service area through the year 2045. Thus, the Project would not conflict with the Regional Planning Policies related to climate resilience.

Based on the above and as presented in Table 1 in Appendix K of this Draft EIR, overall, the Project would not conflict with the relevant Regional Planning Policies within the 2024–2050 RTP/SCS.

(b) County of Los Angeles River Master Plan

As discussed above, the LARRMP and RIO District represent one of the four planning overlays for the County's LA River Master Plan. As demonstrated by the analysis below, the Project would overall be consistent with the LARRMP and RIO District. In addition, the Project would also support applicable goals of the County's Los Angeles River Master Plan described above. In particular, the Project would support the goal to reduce flood risk by improving the drainage system within the Project Site, which would reduce drainage flows. As the Project would provide improved bicycle and pedestrian access and connections to the Los Angeles River, it would also support the goals to provide trails and equitable access to the river corridor. Finally, with the improved drainage systems on-site that would improve water quality, the Project would also support the goal to provide for clean water

(c) Local Plans and Applicable Policies

As discussed above, various local plans and regulatory documents guide development of the Project Site. The following discussion addresses the Project's potential to conflict with applicable goals, objectives, and policies of the General Plan, including the Framework Element, Mobility Plan, Conservation Element, Health and Wellness Element (Plan for a Healthy Los Angeles), and Community Plan; LAMC (Zoning Code); and Citywide Design Guidelines that were specifically adopted for the purpose of avoiding or mitigating an environmental effect.

(i) Los Angeles General Plan

(1) Framework Element

The Project's potential to conflict with the applicable goals, objectives, and policies set forth in the Framework Element adopted for the purpose of avoiding or mitigating an

environmental effect is discussed in detail in Table 2 of Appendix K of this Draft EIR and summarized below.

(a) Land Use Chapter

The Framework Element's Land Use Diagrams designate districts, centers, and mixed-use boulevards. The Project Site is located in an area that is identified as a Community Center on the Framework Element's Long Range Land Use Diagram for the City's San Fernando Valley area. The Project would support the City's policy to accommodate new development that would support the projected needs of the City's population within the patterns of use guided by the Long-Range Lang Use Diagram. The Project would establish the proposed Specific Plan to allow for the continuation of the existing studio use and the modernization and expansion of media production facilities within the approximately 55-acre Radford Studio Center, which is well-served by public transit, including Metro and DASH bus lines with stops in close proximity to the Project Site along Ventura Boulevard.

The Project would also provide a variety of open space and landscaping improvements, as well as pedestrian enhancements consistent with the LARRMP, including, but not limited to, a new publicly-accessible, multi-modal bridge, the Radford Bridge, which would provide pedestrian and bicycle access across the Tujunga Wash, as well as ramps and/or stairs to provide direct access to the LARRMP improvements. The Radford Bridge would also provide access for studio-related vehicles only. These improvements would be made in accordance with the City's policies to identify areas for new open space opportunities and provide for the development of land use patterns that emphasize pedestrian and bicycle access. Along Radford Avenue, enhanced sidewalks and a landscaped setback are proposed, along with a Class IV protected bikeway from Hoffman Street to the Radford Bridge. Furthermore, as previously noted, the Project would include on-site Mobility Hubs for Radford Studio Center users that would serve to reduce VMT in accordance with the City's objective to provide for development that facilitates a reduction of vehicle trips, VMT, and air pollution. These Project improvements would serve to enhance the pedestrian environment, encourage alternative modes of transportation, and reduce VMT.

The Project would promote the City's policy to provide for the siting and design of new development that maintains the prevailing scale and character of the commercial and industrial districts by establishing height subareas (Subareas A through D) with specified height limits and limited height allowances to regulate building heights throughout the Project Site, with taller maximum heights concentrated in the center of the Project Site, away from Project Site edges. Buildings in Subareas A and D would be limited to 60 feet and 75 feet, respectively. Subarea B provides a base height limit of 75 feet, and buildings up to a maximum height of 95 feet would be permitted in up to 30 percent of Subarea B. Subarea C provides a base height limit of 75 feet, and buildings up to a maximum height of 135 feet

would be permitted in up to 30 percent of Subarea C. A 17-foot-wide setback would be provided along Radford Avenue in the North Lot, and a 10-foot-wide setback area would be provided along Radford Avenue in the South Lot. A 15-foot-wide setback would be provided along Colfax Avenue in the South Lot. Setbacks would function as buffers and transitional space around the Project Site perimeter. Further, the Los Angeles River and Tujunga wash function as approximately 150-foot to 97-foot buffers from the residential uses across those channels. These height subareas and associated setbacks and stepbacks would limit future development to concentrate building height toward the center of the Project Site and away from the existing commercial and residential uses, as well as the Los Angeles River and the Tujunga Wash.

Based on the above, the Project would support and not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Land Use Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(b) Urban Form and Neighborhood Design Chapter

The Project would not conflict with the City's goals, objectives, and policies of the Urban Form and Neighborhood Design Chapter applicable to the Project by contributing to the overall livability of the City. Specifically, the Project would support the City's objective to encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community, or the region by expanding upon existing studio uses within an area well-served by public transit, specifically Metro and DASH bus stops in close proximity to the Project Site. The proposed uses would be consistent with the existing uses on-site, as well as the other commercial developments located adjacent to and in the general vicinity of the Project Site.

The Project would also support the City's objective to enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public areas immediately surrounding the Project Site. As previously discussed, the Project would provide pedestrian enhancements consistent with the LARRMP, including a new publicly accessible, multi-modal bridge, the Radford Bridge, which would provide pedestrian and bicycle access to the Tujunga Wash, as well as ramps and/or stairs to provide direct access to the LARRMP improvements. The Radford Bridge would also provide access for studio-related vehicles only. Additionally, the existing alley adjacent to the southern portion of the South Lot~~,~~ would provide stormwater management best practices. Along Radford Avenue, enhanced sidewalks and a landscaped setback are proposed, along with a Class IV protected bikeway from Hoffman Street to the Radford Bridge. Additionally, the Project would contribute to and implement traffic-calming measures as part of a Neighborhood Traffic Management Plan to address potential cut-through traffic on surrounding streets, as also discussed in Section IV.M, Transportation, of this Draft EIR.

The Project would make effective use of the built environment to help increase personal safety at all times of the day by incorporating elements that promote individual and community safety. Controlled access would continue to be provided at all vehicular and pedestrian entrances to the Project Site. Project security would be achieved via a combination of physical and operational strategies aimed at providing a secure and safe working studio environment. Fencing, walls, landscaping, and other elements would be used to visually screen and create a physical barrier at the perimeter of the Project Site to maintain the necessary privacy for production activities and ensure the safety of all studio users. In addition, points of entry would be secured by elements such as guard booths, key card passes, pedestrian and vehicular access controls, and site-wide lighting. Operational elements, such as a 24-hour security camera network, controlled access to all buildings, private on-site security staff, and regular security patrols of the Project Site, would further enhance the security and safety of the studio.

Based on the above, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Urban Form and Neighborhood Design Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(c) Open Space and Conservation Chapter

The Project would not conflict with the goals and policies of the Open Space and Conservation Chapter by providing a variety of open space areas within the Project Site. Specifically, the Project would provide 109,569 square feet of landscaped area along the Project Site frontages, including 77,406 square feet of landscaped area along the Los Angeles River and Tujunga Wash frontages, approximately 4,454 square feet of landscaped area along Colfax Avenue, and approximately 27,709 square feet of landscaped area along Radford Avenue. Additional landscape and hardscape areas would be provided within the Project Site, including various ground level open space areas and rooftop terraces. Planting zones and associated plant palettes would be established to define streetscape areas, Project Site entrances, production areas, bungalows, and the rooftop terraces. The rooftop terraces would be designed as landscaped open spaces to be used for meetings, special events, filming, and other production-related activities.

In addition, the Project is proposing pedestrian enhancements consistent with the LARRMP, including a new publicly-accessible, multi-modal bridge, the Radford Bridge, which would provide pedestrian and bicycle access to the Tujunga Wash, as well as ramps and/or stairs to provide direct access to the LARRMP improvements. The Radford Bridge would also provide access for studio-related vehicles only. Along Radford Avenue, enhanced sidewalks and a landscaped setback are proposed, along with a Class IV protected bikeway from Hoffman Street to the Radford Bridge. The Project has been designed to enhance access to and connect pedestrians and bicyclists with the Los Angeles River and Tujunga Wash.

Based on the above, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Open Space and Conservation Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(d) Economic Development Chapter

The Project would not conflict with the City's objective to establish a balance of land uses that provide for commercial development which meets the needs of local residents, sustains economic growth, and assures environmental quality through the development of a mix of integrated and supporting land uses within a single site. Specifically, the Project represents the continuation of an existing studio use and would involve the modernization and expansion of media production facilities within the approximately 55-acre Radford Studio Center to meet both the existing unmet and anticipated future demands of the entertainment industry and keep production activities as well as jobs in Los Angeles, while rehabilitating and preserving the integrity of the existing historic resources on-site and in consideration of the surrounding uses. In addition, by providing Mobility Hubs on-site, the Project would facilitate a reduction in vehicle trips and VMT, in turn reducing emissions. Furthermore, a number of specific sustainable design components would be incorporated into the Project, including, but not limited to, Energy Star appliances, solar panels, plumbing fixtures and fittings that comply with the performance requirements specified in the Los Angeles Green Building Code, weather-based irrigation systems, water-efficient plantings with drought-tolerant species, shade trees in public areas; green walls in some outdoor areas, vegetated roofs or cool roof systems to help reduce energy use, short- and long-term bicycle parking, EV charging infrastructure, use of daylighting where feasible, energy-efficient lighting, and permeable paving where appropriate. The Project would also be designed to meet LEED Gold or equivalent requirements and comply with the City's All-Electric Buildings Ordinance (Ordinance No. 187,714), as applicable. Such features would address energy conservation, water conservation, and waste reduction. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Economic Development Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(e) Infrastructure and Public Services Chapter

The Project would not conflict with the City's goal and policy to reduce the total amount of flow entering the stormwater system, as well as to pursue effective and efficient approaches to protecting water quality and reducing the amount of hazardous substances entering the wastewater system by implementing a Stormwater Pollution Prevention Plan (SWPPP) during construction that would include best management practices (BMPs) and other erosion control measures to minimize the discharge of pollutants into stormwater runoff, as discussed in Section IV.I, Hydrology and Water Quality, of this Draft EIR. The Project would also comply with the requirements of the City's Low Impact Development (LID) Ordinance to reduce the discharge of runoff from the Project Site and would implement BMPs

(i.e., infiltration systems, stormwater capture and use, and/or high efficiency biofiltration/ bioretention systems). Implementation of Project BMPs would minimize the discharge of pollutants from the Project Site. Additionally, Project-generated wastewater would be accommodated by the existing capacity of the Hyperion Water Reclamation Plant. Further, the Los Angeles Bureau of Sanitation determined that it has adequate treatment capacity to serve the Project's projected demand in addition to existing commitments.

As evaluated in the Water Supply Assessment (WSA) prepared by the Los Angeles Department of Water and Power (LADWP) and summarized in Section IV.O.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the LADWP current and projected available water supplies for normal, single-dry, and multiple-dry years would be sufficient to meet the Project's water demand in addition to the existing and planned future water demands within LADWP's service area through the year 2045. Moreover, the Project would not exceed the available capacity of the water distribution infrastructure that would serve the Project Site.

Based on the above, the Project would not conflict with the applicable goals, objectives, and policies of the Framework Element's Infrastructure and Public Services Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(f) Conclusion

Based on the above and as presented in Table 2 in Appendix K of this Draft EIR, the Project would not conflict with the applicable goals, objectives, and policies of the Framework Element adopted for the purpose of avoiding or mitigating an environmental effect.

(2) Mobility Plan

The Project's potential to conflict with the applicable goals, objectives, and policies set forth in the Mobility Plan adopted for the purpose of avoiding or mitigating an environmental effect is discussed in detail in Table 3 of Appendix K of this Draft EIR.

During construction, the Project would not conflict with the City's policy to provide for safe passage of all modes of travel during construction by preparing and implementing a Construction Traffic Management Plan (CTMP), pursuant to Project Design Feature TR-PDF-1. The CTMP would include temporary traffic controls during all construction activities adjacent to public rights-of-way on public roadways to provide for the safe passage for all modes of travel during construction. The CTMP would be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site. In addition, a work site traffic control plan identifying the location of all temporary roadway lane and/or sidewalk closures needed during Project construction would be submitted to LADOT.

The Project would also not conflict with the City's policy to ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment by promoting walkability through the Project's design and pedestrian and streetscape improvements. Specifically, the Project would provide pedestrian enhancements consistent with the LARRMP, including a new publicly-accessible, multi-modal bridge, the Radford Bridge, which would provide pedestrian and bicycle access to the Tujunga Wash, as well as ramps and/or stairs to provide direct access to the LARRMP improvements. The Radford Bridge would also provide access for studio-related vehicles only. Along Radford Avenue, enhanced sidewalks and a landscaped setback are proposed, along with a Class IV protected bikeway from Hoffman Street to the Radford Bridge. Furthermore, pedestrian and bicycle access would be provided at the same primary access points, including at the Radford Gate, the Sater parking structure, the Carpenter Gate along Ventura Boulevard, and the Colfax Gate. Additional pedestrian and bicycle access points along Radford Avenue and one access point along the alley would also be available. All access points would be controlled with gates and/or staffed guard houses. Additionally, the Project would contribute to and implement traffic-calming measures as part of a Neighborhood Traffic Management Plan to address potential cut-through traffic on surrounding streets, as also discussed in Section IV.M, Transportation, of this Draft EIR.

The Project recognizes all modes of travel, including pedestrian, bicycle, transit, and vehicular modes, as integral components of the City's transportation system by providing safe and accessible pedestrian, bicycle, and vehicular access, and easy access to transit. Specifically, the Project would encourage transit usage by developing the proposed uses in an area well-served by a variety of public transit options including Metro and DASH bus stops in close proximity to the Project Site along Ventura Boulevard. The Project would also provide short-term and long-term bicycle parking spaces in accordance with LAMC requirements, including secured bicycle parking facilities, showers, lockers, and bicycle service areas with repair stands within the Project Site. Additionally, the Project would implement a TDM program to further reduce the number of single-occupancy vehicle trips and the pedestrian and streetscape enhancements described above to encourage walking. The Project also includes Mobility Hubs, which would support first-mile/last-mile connections; encourage employee use of public transit, carpooling, vanpooling, and biking/scootering to work; and support other TDM strategies. The Mobility Hubs would provide an off-street space for passenger pick-up/drop-off and the temporary parking of buses, carpools, vanpools, shuttles, ride-share, taxi, and other commercial and non-commercial vehicles. The Mobility Hubs would include space to accommodate support uses, storage, maintenance, staging facilities, bike share, and ridership amenities. The Project would support employees and visitors, who choose to travel by automobile through the maintenance of the ingress/egress driveways at the Radford Gate, the Sater parking structure along Radford Avenue, and the ingress/egress driveway at the Colfax Gate located along Colfax Avenue. Additional vehicular access from Ventura Boulevard would be provided via a former ingress/egress driveway at the Carpenter Gate that would be restored as part of the Project.

As previously noted, the proposed Sign District would include general ground level and wayfinding pedestrian signage, architectural ledge signs, digital displays, illuminated architectural canopy signs, information signs, pillar signs, pole signs, projecting signs, supergraphics, window signs, building identification signs, marquee and monument signs, large-format screens, and other sign types, such as on-site wall signs, that are typical on studio campuses. The proposed signage would orient visitors and employees and, in accordance with City policies, would provide widespread, user-friendly information about mobility options and local destinations, delivered through a variety of channels, including traditional signage and digital platforms.

Based on the above and as presented in Table 3 in Appendix K of this Draft EIR, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Mobility Plan adopted for the purpose of avoiding or mitigating an environmental effect.

(3) Conservation Element

The Project would not conflict with the City's goal to preserve, protect, and enhance its existing natural resources or its objective to preserve, protect, restore, and enhance natural plant and wildlife diversity, habitats, corridors, and linkages.

The Project Site in located within an urbanized area and does not contain any large expanses of open space or natural resources. Two large drainage features, the Los Angeles River and Tujunga Wash, which are modified concrete channels that support very limited aquatic habitat and are ecologically disconnected from the rest of the Project Site by the approximately 15-foot-tall concrete side walls, pass through the Project Site. With respect to trees, removal of protected private trees or street trees requires a Tree Removal Permit through the City's Department of Public Works, Urban Forestry Division, and replacement trees are required at a ratio that is consistent with the Tree Protection Ordinance. The Project would comply with the current replacement ratio of 4:1 for permitted protected tree removals and the replacement ratio of 2:1 for street tree removals. The remaining non-protected trees would be replaced at a 1:1 ratio.

As discussed further in Section IV.D, Cultural Resources, of this Draft EIR, the Project Site includes three potentially historic structures, as well as the potential Mack Sennett Historic District. Although the Project would have a potentially significant impact on these historic resources, Mitigation Measures CUL-MM-1 through CUL-MM-20, detailed in Section IV.D, would reduce these impacts to a less-than-significant level.

With respect to archaeological resources, as discussed in Section IV.D, Cultural Resources, of this Draft EIR, the South Central Coastal Information Center records search did not identify any known archaeological resources within the Project Site. Additionally, the geoarchaeological investigation conducted as part of the Archaeological Report indicates

that while no artifacts were found, the Project Site may contain historical-period archaeological deposits and prehistoric archaeological deposits. For these reasons, the Archaeological Resources Assessment, included as Appendix F.2 of this Draft EIR, concluded that there is high sensitivity for buried archaeological resources within the Project Site, and it is possible that excavation activities associated with the Project would involve intact native sediment that may contain archaeological deposits. However, the Project would implement Mitigation Measures CUL-MM-21 and CUL-MM-22 to reduce this potential impact to a less-than-significant level.

With respect to paleontological resources, a records search at the Natural History Museum did not identify any known paleontological resources within the Project Site or within a one-mile buffer. However, seven paleontological localities were noted from similar geologic units to those surrounding and underlying the Project Site at a greater distance. Additionally, 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. Accordingly, the collected data indicate that there is a potential to encounter paleontologically significant resources should proposed excavations extend to native Pleistocene- or Miocene-age deposits, which are expected to be encountered at depths of 20 feet or greater below the surface. Proposed excavations for the Project are expected to extend up to approximately 50 feet below grade in certain areas of the Project Site and, thus, are likely to encounter sediments with a high paleontological sensitivity. The Project would implement Mitigation Measure GEO-MM-1 to reduce this potential impact to a less-than-significant level.

Based on the above, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Conservation Element adopted for the purpose of avoiding or mitigating an environmental effect.

(4) Health and Wellness Element (Plan for a Healthy Los Angeles)

The Project would not conflict with the applicable goals, objectives, and policies of the Health and Wellness Element by promoting healthy living and integrating healthy building design and construction on a site in close proximity to public transit. Specifically, the Project would incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and the CALGreen Code. The Project would be designed to meet LEED Gold or equivalent requirements and comply with the City's All-Electric Buildings Ordinance (Ordinance No. 187,714), as applicable. Both in compliance with and in exceedance of LAMC requirements, a number of specific sustainable design components would be incorporated into the Project. These features include, but are not limited to, Energy Star appliances, solar panels, plumbing fixtures and fittings that comply with the performance requirements specified in the Los Angeles Green Building Code,

weather-based irrigation systems, water-efficient plantings with drought-tolerant species, shade trees in public areas, green walls in some outdoor areas, vegetated roofs or cool roof systems to help reduce energy use, use of daylighting where feasible, energy-efficient lighting, and permeable paving where appropriate.

The Project would also incorporate open space areas and promote pedestrian activity, walkability, and biking and contribute to the creation of a healthy community. As discussed above, the Project would provide pedestrian enhancements consistent with the LARRMP, including a new publicly-accessible, multi-modal bridge, the Radford Bridge, which would provide pedestrian and bicycle routes to the Tujunga Wash, as well as ramps and/or stairs to provide direct access to the LARRMP improvements. Along Radford Avenue, enhanced sidewalks and a landscaped setback are proposed, along with a Class IV protected bikeway from Hoffman Street to the Radford Bridge. The Project would also include 109,569 square feet of landscaped area along Project Site frontages and additional open space and landscaping within the Project Site.

Lastly, the Project would be developed on an urban infill site within a designated TPA in close proximity to transit, including local and regional bus lines, and would implement TDM strategies, which together would reduce Project vehicle trips and VMT, fuel use, and GHG emissions. The Project also includes Mobility Hubs, which would support first-mile/last-mile connections; encourage employee use of public transit, carpooling, vanpooling, and biking/scootering to work; and support other TDM strategies.

Therefore, based on the above, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Health and Wellness Element adopted for the purpose of avoiding or mitigating an environmental effect.

(5) Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan

The Project's general potential to conflict with the goals, objectives, and policies set forth in the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan and adopted for the purpose of avoiding or mitigating an environmental effect is discussed in detail in Table 4 of Appendix K of this Draft EIR.

As discussed therein, the Project would not conflict with the objectives and policies that support the goals of the Community Plan. Specifically, the Project would support the Community Plan's goal to encourage the use of alternative modes of transportation to reduce vehicle trips, as well as the objective to pursue TDM strategies that can maximize vehicle occupancy, minimize average trip length, and reduce VMT. Specifically, the Project would increase urban density on an already developed urban infill site within a TPA in close proximity to jobs, shopping, services, and transit, including Metro and DASH bus lines with

stops adjacent to the Project Site along Ventura Boulevard. As discussed above, the Project would also provide pedestrian enhancements consistent with the LARRMP, including a new publicly-accessible, multi-modal bridge, the Radford Bridge, which would provide pedestrian and bicycle access to the Tujunga Wash, as well as ramps and/or stairs to provide direct access to the LARRMP improvements. The Radford Bridge would also provide access for studio-related vehicles only. Along Radford Avenue, enhanced sidewalks and a landscaped setback are proposed, along with a Class IV protected bikeway from Hoffman Street to the Radford Bridge. Additionally, as detailed in Section IV.M, Transportation, of this Draft EIR, the TDM Program set forth in Project Design Feature TR-PDF-1 would include strategies that further encourage the use of transit and other alternative modes of transportation, such as bicycle parking and amenities, pedestrian amenities, a ride-share matching and carpool/vanpool program, etc. The Project also includes Mobility Hubs, which would support first-mile/last-mile connections; encourage employee use of public transit, carpooling, vanpooling, and biking/scootering to work; and support other TDM strategies. These Project characteristics would serve to promote the use of alternative modes of transportation, as well as reduce single-occupancy vehicle trips.

The Project would also support the Community Plan objectives and policies related to open space. Existing open space on the Project Site is generally limited to small, landscaped areas and surface parking areas. The Project's open space and landscaping plan has been designed to enhance the public right-of-way along all Project Site frontages and enhance public access to the Los Angeles River and Tujunga Wash. 109,569 square feet of landscaped area would be provided along the Project Site frontages, including 77,406 square feet of landscaped area along the Los Angeles River and Tujunga Wash frontages, 4,454 square feet of landscaped area along Colfax Avenue, and 27,709 square feet of landscaped area along Radford Avenue.

With respect to the objectives and policies related to police protection, as discussed in Section IV.L.2, Public Services—Police Protection, of this Draft EIR, the Los Angeles Police Department (LAPD) was consulted during the preparation of this Draft EIR. As stated in LAPD's letter included in Appendix N of this Draft EIR, the Project would not result in the need for new or altered police facilities. Additionally, as discussed in Section IV.L.2, Public Services—Police Protection, of this Draft EIR, through Project Design Features POL-PDF-2 through POL-PDF-7, the Project would include numerous operational design features to enhance safety within and immediately surrounding the Project Site, thereby reducing the demand for police services.

With respect to the objectives and policies related to fire protection, as discussed in Section IV.L.1, Public Services—Fire Protection, of this Draft EIR, the Los Angeles Fire Department (LAFD) was consulted during the preparation of this Draft EIR. In addition, compliance with applicable Building and Fire Code requirements would be confirmed as part of LAFD's fire/life safety plan review and fire/life safety inspection, as set forth in LAMC Section 57.118, prior to the issuance of a building permit. As concluded in Section IV.L.1, Public

Services—Fire Protection, of this Draft EIR, the Project's impacts related to fire public services would be less than significant.

With respect to the Community Plan's goal and objective related to historic preservation, the Project Site includes three potentially historic structures, as well as the potential Mack Sennett Historic District. Although the Project would have a potentially significant impact on these historic resources, Mitigation Measures CUL-MM-1 through CUL-MM-20 detailed in Section IV.D would reduce these impacts to a less-than-significant level.

Based on the above and as presented in Table 4 in Appendix K of this Draft EIR, the Project would not conflict with the applicable objectives and policies of the Community Plan adopted for the purpose of avoiding or mitigating an environmental effect.

(ii) Los Angeles Municipal Code

As previously discussed, the North Lot is zoned [Q]MR2-1L-RIO (subject to a "Q" Qualified Classification, 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 Project includes the proposed Specific Plan to allow for the continuation of an existing studio use and the modernization and expansion of media production facilities within the approximately 55-acre Radford Studio Center. As described above, the proposed Specific Plan would establish development guidelines and standards to regulate basic planning, design, and development concepts for future development on the Project Site. As such, the proposed Specific Plan would establish standards to regulate land use, massing, design, and development within the Project Site, while allowing for adaptation to potential changes in technology or space requirements that are inherent to the pace of advancement in entertainment technology.The primary development regulations set forth in the proposed Specific Plan would address land use, design, historic regulations, childcare, alcohol sales, and parking, as well as associated implementation procedures.

Pursuant to LAMC Section 12.32, the Applicant is requesting a Vesting Zone Change from the existing [Q]MR2-1L-RIO and [Q]M2-1-RIO zones to the Radford Studio Center Specific Plan Zone (RSC Zone), thus creating a cohesive Project Site subject to uniform land use regulations. The proposed RSC zoning designation would set forth regulatory controls for the orderly and cohesive development of the Project Site, comparable to existing zoning requirements, while recognizing the unique land uses that have been operating on the Project Site for many decades.

The Project also includes a proposed Sign District, which would regulate signage, in conjunction with applicable LAMC signage provisions, in terms of placement, scale, color, illumination, and material. The proposed Sign District would regulate the permitted number of signs, sign types, sign heights, and the maximum area of signage permitted along each public street frontage. These limitations would not apply to interior signs[16] that generally are not visible from off-site, public rights-of-way, or any publicly accessible plaza adjacent to a public right-of-way. Several types of signs would be prohibited throughout the Project Site, including off-site signs (i.e., billboards), and exterior-facing digital displays -. Prohibited sign types would also include those that contain obscene matters, as defined in Section 311 of the State Penal Code; those that contain or consist of posters, pennants, banners, ribbons, streamers, or spinners, except as permitted by the LAMC; and those that contain flashing, mechanical, or strobe lights in conflict with the provisions of LAMC Sections 80.08.4 and 93.0107. Project signage may include both externally and internally lit signs, and LAMC illumination regulations would apply.

Therefore, with the approval of the proposed Specific Plan, associated RSC Zone, and Sign District, the Project would not conflict with the LAMC.

(iii) Citywide Design Guidelines

The Citywide Design Guidelines are intended as performance goals and not strict regulations or development standards. Although each of the Citywide Design Guidelines should be considered in a project, not all are appropriate in every case. As detailed below, the Project would not conflict with the applicable Citywide Design Guidelines. Not all of the Citywide Design Guidelines were adopted for the purpose of avoiding or mitigating an environmental effect, but are nevertheless included below for informational purposes.

Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all.

Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.

Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.

With respect to Guidelines 1 and 3, the Project would enhance the streetscape adjacent to the Project Site by implementing a design that would enhance the pedestrian experience. Specifically, the Project would provide pedestrian enhancements consistent with the LARRMP, including a new publicly-accessible, multi-modal bridge, the Radford Bridge,

[16] *"Interior" refers to approximately 100 feet from Project Site edges.*

which would provide public pedestrian and bicycle access to the Tujunga Wash, as well as public ramps and/or stairs to provide direct access to the LARRMP improvements. The Radford Bridge would also provide access for studio-related vehicles only. Along Radford Avenue, enhanced sidewalks and a landscaped setback are proposed, along with a Class IV protected bikeway from Hoffman Street to the Radford Bridge. Project lighting would incorporate low-level exterior lights on the buildings and along pathways for security and wayfinding purposes. Low-level lighting to accent signage would be featured on the Project Site, and architectural features and landscaping elements would be incorporated within the Project Site to provide for efficient and effective lighting solutions that minimize light spill-over to neighboring buildings and the surrounding area. In addition, as provided in Section IV.L.2, Public Services—Police Protection, of this Draft EIR, the Project would implement several operational design features to enhance safety within and immediately surrounding the Project Site, including a 24-hour/seven-day security plan to ensure the safety of employees and site visitors; lighting of buildings and walkways to facilitate pedestrian orientation and clearly identify secure routes between parking areas and points of entry into buildings; sufficient lighting of parking areas, elevators, and lobbies to maximize visibility and reduce areas of concealment; and requiring building entrances/exits, spaces around buildings, and pedestrian walkways to be designed to be open and in view of surrounding sites.

The Project would also enhance the public areas along all Project Site frontages through sidewalk improvements, including the widening of sidewalks in some areas consistent with Mobility Plan standards; installation of new street trees and landscaping, lighting, wayfinding signage; and provision of pedestrian amenities, such as benches, which would encourage the Project to actively engage with streets and public space at human scale. The Project would provide a 17-foot-wide setback area along the western edge of the North Lot and a 10-foot-wide setback area along the western edge of the South Lot along Radford Avenue, as well as a 15-foot-wide setback area along the southeastern edge of the South Lot along Colfax Avenue. A protected bikeway would also be provided along Radford Avenue, consistent with the Los Angeles Department of City Planning's 2010 Bicycle Plan. The Project would also upgrade the crosswalks and bus stops around the Project Site and provide designated pedestrian entrances to the Project Site. Moreover, the Project would include safe, delineated pathways for pedestrians throughout the Project Site.

With respect to Guideline 2, the Project would include pedestrian-only entrances separate from vehicular access points to minimize potential vehicle-pedestrian conflicts. Specifically, pedestrian and bicycle access would be provided at the same primary access points, including at the Radford Gate, the Sater parking structure, the Carpenter Gate, and the Colfax Gate. Additional access points along Radford Avenue and one pedestrian access point along the alley would also be available. All of the access points would be secured and controlled with gates and/or staffed guard houses. Further, all vehicular driveways would be designed to maximize pedestrian refuge areas between driveways along the same block to maintain safe pedestrian flow along the sidewalks, and all Project driveway designs would

be subject to the approval of the LADOT and Los Angeles Bureau of Engineering. The Project also includes pedestrian enhancements as discussed above.

Therefore, the Project would not conflict with Citywide Design Guidelines 1 through 3.

Guideline 4: Organize and shape projects to recognize and respect surrounding context.

The Project Site is located in an urbanized area that is developed with a mix of land uses. Ventura Boulevard, the major arterial in the immediate vicinity of the Project Site, is lined with commercial, institutional, and residential uses. Other major arterials in the Project Site vicinity include Laurel Canyon Boulevard, Moorpark Street, and Colfax Avenue, which are all generally lined with medium- and high-density multi-family residential uses and commercial uses. Immediately west of the South Lot across Radford Avenue are a four-story apartment complex, an automobile repair shop, and a single-story, single-tenant restaurant building. To the west and south of the South Lot is a six-story (approximately 75-foot-high) office building located along Radford Avenue and Ventura Place. Further west of the South Lot is a neighborhood of several multi-family residential developments. Immediately west of the North Lot across Radford Avenue are various one-, two-, and three-story low- and medium-density single- and multi-family residential developments. Further west of the North Lot is a neighborhood of several single-family residential developments. Low- and mid-rise commercial buildings and mini shopping centers occupied by general office uses, restaurants, retail uses, automobile repair shops, motels, and government uses are located south of the Project Site, across the abutting public alley and fronting Ventura Boulevard. Properties along the south side of Ventura Boulevard are improved with similar uses. Further to the south beyond Ventura Boulevard are three- and four-story multifamily residential buildings and Carpenter Community Charter School. To the north and east, the Project Site is bounded by the Tujunga Wash and Los Angeles River, respectively, which provide approximately 97-foot to 150-foot buffers from the residential uses across those channels. Many of the streets in the vicinity of the Project Site are lined with street trees, and the major arterials exhibit substantial commercial signage, including multiple large double-faced, off-site billboard signs along Ventura Boulevard.

The Project incorporates site planning and architectural strategies to complement the scale and character of the surrounding neighborhood. As discussed in Section, II, Project Description, of this Draft EIR, the proposed Specific Plan height subareas (Height Subareas A through D) with specified height limits and limited height allowances would be established to regulate building heights throughout the Project Site, with taller maximum heights concentrated toward the center of the Project Site, away from Project Site's edges. The proposed Specific Plan would also establish setback and stepback requirements to recognize and respect the scale of the surrounding areas. Except for Subarea A, which would establish a 60-foot height limit, much of the Project Site would be subject to a sitewide

height limit of 75 feet as measured from Project grade (i.e., 595 feet AMSL for the North Lot and 610 feet AMSL for the South Lot). This height limit would be augmented with additional height allowances permitted in a limited portion of Subareas B and C. The height subareas and associated setbacks and stepbacks (discussed below) would limit future development to concentrate building height towards the center of the Project Site and away from the existing commercial and residential uses, as well as the Los Angeles River and the Tujunga Wash. Further, a 20-foot stepback from the property line of the South Lot along Radford Avenue, Colfax Avenue and the public alley would be required for any new building that exceeds 75 feet in height. Any building or structure, except for historic resources, may also be demolished and replaced with a new building or structure that would not exceed the square footage set forth in the Radford Studio Center Specific Plan and subject to the approval process detailed therein. Collectively, these building restrictions and design elements would allow Project development to remain sensitive to surrounding uses. Therefore, the Project would not conflict with Citywide Design Guideline 4.

Guideline 5: Express a clear and coherent architectural idea.

The overall design strategy of the Project and the proposed Specific Plan is to maintain the existing studio uses on the Project Site, develop new facilities integral to the future needs and demands of the entertainment industry, and integrate the Project Site with the Los Angeles River and Tujunga Wash. The design intent of the proposed Specific Plan is to functionally integrate new development within the Project Site such that maximum permitted height is generally located toward the center of the Project Site and shifted away from the Project Site perimeter. The Project design also includes infrastructure and landscaping improvements in the public areas, such as pedestrian/bicycle path improvements on Radford Avenue, as well as other improvements west of the Los Angeles River and Tujunga Wash and within the alley south of the Project Site (parallel to Ventura Boulevard), described further below. The Project also proposes a Sign District that would regulate signage, in conjunction with applicable LAMC signage provisions, in terms of placement, scale, color, illumination, and material. Project signage would be integrated with and complement the overall aesthetic character of on-site development and would be designed to both enhance the studio character of the Specific Plan area. Project signage could include general ground level and wayfinding pedestrian signage around the Project Site perimeter, architectural ledge signs, digital displays, illuminated architectural canopy signs, information signs, pillar signs, pole signs, projecting signs, supergraphics, window signs, building identification signs, marquee and monument signs, large-format screens, and other sign types, such as on-site wall signs that are typical on studio campuses. All of these elements would be designed to complement the overall design of the Project Site, creating a coherent architectural idea. Therefore, the Project would not conflict with Citywide Design Guideline 5.

Guideline 6: Provide amenities that support community building and provide an inviting, comfortable user experience.

As discussed above under Guidelines 1 and 3, the Project would enhance the streetscape adjacent to the Project Site by implementing a design that would enhance the pedestrian experience including, but not limited to, the Radford Bridge, and enhanced sidewalks, landscaping, and a bikeway.

Additionally, 109,569 square feet of landscaped area would be provided along the Project Site frontages, including 77,406 square feet of landscaped area along the Los Angeles River and Tujunga Wash frontages, 4,454 square feet of landscaped area along Colfax Avenue, and 27,709 square feet of landscaped area along Radford Avenue. Additional landscape, and hardscape would be provided within the Project Site, including various ground level open space areas and rooftop terraces. Planting zones and associated plant palettes would be established to define streetscape areas, Project Site entrances, production areas, bungalows, and the rooftop terraces. The rooftop terraces would be designed as landscaped open spaces to be used for meetings, special events, filming, and other production-related activities. Therefore, the Project would not conflict with Citywide Design Guideline 6.

Guideline 7: Carefully arrange design elements and uses to protect site users.

Pedestrian and bicycle access would be provided at the same primary access points, including at the Radford Gate, the Sater parking structure, the Carpenter Gate, and the Colfax Gate. Additional access points along Radford Avenue and one pedestrian access point along the alley would also be available. All access points would be controlled with gates and/or staffed guard houses. As discussed above, the proposed Specific Plan would include the extension of Radford Avenue via the proposed Radford Bridge, which would provide public pedestrian and bicycle access to the Los Angeles River and Tujunga Wash and vehicular ingress and egress to and from the North Lot via Moorpark Street. With the exception of emergency access, the Radford Mobility Hub would not provide through access for vehicles along Radford Avenue. Removable bollards, fire access gates, planters, and/or other traffic calming measures would be installed to prevent cut-through vehicular traffic by prohibiting vehicular access from Moorpark Street south to Ventura Boulevard. Vehicular access to the Project Site from Radford Avenue would be provided via an existing ingress/egress driveway along Radford Avenue, at the Radford Gate, and via an existing ingress/egress driveway at the northwestern portion of the South Lot, which provides access to the existing Sater parking structure. Two additional existing ingress/egress driveways along Radford Avenue, adjacent to the North Lot, would be for limited access only. Vehicular access from Ventura Boulevard would be provided via a former ingress/egress driveway at the Carpenter Gate that would be restored as part of the Project. All driveways would be designed in accordance with the City standard plans for driveways and would be subject to

approval by the LADOT and Los Angeles Bureau of Engineering (BOE). Overall, Project's proposed pedestrian and vehicular improvements would prioritize safety and access for all individuals. Therefore, the Project would not conflict with Citywide Design Guideline 7.

Guideline 8: Protect the site's natural resources and features.

The Project Site is located within an urbanized area and does not contain any large expanses of open space or natural resources. Two large drainage features, the Los Angeles River and Tujunga Wash, which are modified concrete channels that support very limited aquatic habitat and are ecologically disconnected from the rest of the Project Site by the approximately 15-foot-tall concrete side walls, pass through the Project Site. With respect to trees, removal of protected private trees or street trees requires a Tree Removal Permit through the City's Department of Public Works, Urban Forestry Division, and replacement trees are required at a ratio that is consistent with the Tree Protection Ordinance. The Project would comply with the current replacement ratio of 4:1 for permitted protected tree removals and the replacement ratio of 2:1 for street tree removals. The remaining non-protected trees would be replaced at a 1:1 ratio. Therefore, the Project would not conflict with Citywide Design Guideline 8.

Guideline 9: Configure the site layout, building massing and orientation to lower energy demand and increase the comfort and well-being of users.

All buildings and occupiable spaces on the Project Site have been sited to optimize solar exposure (both shade and sun) and optimize viewsheds. The production office and production support buildings would generally be oriented with their long dimensions running in the east-west direction to minimize solar heat gain from the east and west. Setbacks for balconies on the upper levels of the south-facing facades provide opportunities to integrate shade providing landscaping along the southern exposure. Plazas and landscaped open spaces are located where people would benefit from seasonal exposures with readily accessible shade.

The Project would incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and the CALGreen Code. Specifically, both in compliance with and in exceedance of LAMC requirements, a number of specific sustainable design components would be incorporated into the Project. These features include, but are not limited to, Energy Star appliances, solar panels, plumbing fixtures and fittings that comply with the performance requirements specified in the Los Angeles Green Building Code, weather-based irrigation systems, water-efficient plantings with drought-tolerant species, shade trees in public areas, green walls in some outdoor areas, vegetated roofs or cool roof systems to help reduce energy use, use of daylighting where feasible, energy-efficient lighting, and permeable paving where appropriate. The Project would also be designed to meet LEED Gold or equivalent requirements and would

comply with the City's All-Electric Buildings Ordinance (Ordinance No. 187,714), as applicable. In addition, the Project would provide short-term and long-term bicycle parking spaces, EV charging stations, and parking spaces capable of supporting future EVSE in compliance with LAMC requirements,-.

The Project would also incorporate open space areas and promote pedestrian activity, walkability, and biking, thereby increasing the comfort and well-being of users. As discussed above, the Project would provide pedestrian enhancements consistent with the LARRMP, including a new publicly-accessible, multi-modal bridge, the Radford Bridge, extending from the northern terminus of Radford Avenue north to the Tujunga Wash to Moorpark Street (no through access for public vehicles would be permitted north or south along Radford Avenue); median plantings, undergrounding of utilities, sidewalk paving, and improvements to the existing Art Walk along Radford Avenue; fencing, solar lighting, signage, bio-swales, and plantings along the Tujunga Wash; a new pedestrian signal at Moorpark Street; improvements to the existing bridge connecting the North and South Lot; and landscaping between the back of the sidewalk and any security fence along each street frontage. The Project would also include 109,569 square feet of landscaped areas along Project Site frontages and additional open space and landscaping within the Project Site.

Overall, the Project would not conflict with Citywide Design Guideline 9.

Guideline 10: Enhance green features to increase opportunities to capture stormwater and promote habitat.

The Project Site does not have any existing structural or LID BMPs to treat or infiltrate stormwater beyond landscaped stormwater infiltration basins in some of the parking areas, and implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions. As described in Section IV.I, Hydrology and Water Quality, of this Draft EIR, the Project may include stormwater best management practices. The City's preferred LID improvement is on-site infiltration of stormwater. If infiltration is determined to be infeasible for the Project Site, the next tier in the LID Manual is a stormwater capture and reuse system. If capture and reuse is later determined to be infeasible, the Project would implement high efficiency biofiltration/bioretention systems pursuant to LID requirements. Overall, the implementation of BMPs required by the City's LID Ordinance would reduce the pollutants generated by the Project that could potentially be carried in stormwater runoff. Therefore, the Project would not conflict with Citywide Design Guideline 10.

(iv) River Improvement Overlay

The Project Site is located within the RIO District and would be required to comply with the Los Angeles River Design Guidelines, which establish best practices for designing

development projects located within the RIO District. The River Design Guidelines illustrate options, solutions, and techniques to improve the aesthetic quality of the Los Angeles River and its surrounding communities. The River Design Guidelines consist of overarching objectives followed by a list of specific implementation strategies addressing river-adjacent development. The Project would support the applicable objectives of the River Design Guidelines. Specifically, the Project would consider river context, visibility, and access in building and site design (Objective 1) and maximize access to, and awareness of, the river and its relationship to the community (Objective 3) by enhancing public access to the Los Angeles River and Tujunga Wash. The Project would employ high quality, attractive and distinguishable architecture (Objective 2) and minimize the quantity and appearance of parking and loading areas by locating all parking and loading areas underground or screened from public view (Objective 4).

In addition, in compliance with efforts to revitalize the Los Angeles River under the City's RIO District Ordinance and LARRMP and per the County's Landscaping Guidelines, the Project would enhance public access to the Los Angeles River and Tujunga Wash. In addition, as shown in Figure II-19 in Section II, Project Description, the Project would provide new and refreshed landscaping within portions of the proposed development areas located to the west of the Tujunga Wash and Los Angeles River within the eastern portion of the Project Site.

Table IV.A-5 in Section IV.A, Aesthetics, includes a detailed analysis of the Project's potential to conflict with Section 13.17 F, which establishes the development regulations in RIO districts most related to scenic quality. As demonstrated therein, while the Project would be inconsistent with or partially inconsistent with several of the development regulations, overall the Project would be consistent with the intent of the requirements for development in an RIO district.

With respect to RIO lighting regulations, as also discussed in greater detail in Section IV.A, Aesthetics, the LAMC lighting regulations for the RIO were established in 2014, and do not account for the operation of the studio since the 1920s. In addition, the RIO Ordinance identifies maximum illuminance at the "site boundary" but does not take into account the unique nature and boundaries of the Project Site. Portions of the concrete-lined Los Angeles River and Tujunga Wash traverse the Project Site in dedicated easement areas. Furthermore, given that the RIO Ordinance was adopted in 2014, well after operation of the studio began, both existing and historical lighting levels at the Project Site exceed the lighting standards in the RIO Ordinance. However, the Project includes a proposed Specific Plan to establish land use regulations for the Project Site to ensure consistent implementation of development standards throughout the Project Site in recognition of the Project Site's unique characteristics, including the particular nature and demands of an existing studio use and specific constraints posed by the Project Site's location, which are not experienced at other sites. These are included as Project Design Features AES-PDF-3 through AES-PDF-18,

which limit maximum luminance and include time-sensitive dimming. With implementation of these project design features, exterior lighting impacts would not exceed existing conditions, and the Project would not conflict with the intent of the RIO lighting regulations.

Therefore, the Project would generally not conflict with the regulations of the RIO District.

(v) Los Angeles River Revitalization Master Plan

With respect to the LARRMP, as discussed in greater detail in Section IV.C, Biological Resources, of this Draft EIR, in compliance with efforts to revitalize the Los Angeles River and consistent with the City's RIO District Ordinance and LARRMP, and the County's Landscaping Guidelines, the Project would help beautify and enhance public access to the Los Angeles River and Tujunga Wash. Specifically, the Project would include approximately 77,406 square feet of landscaped areas with pedestrian walkways, trees, and other landscaping, and protected bicycle lanes along the Project's Los Angeles River and Tujunga Wash frontages. The Project would also provide a variety of open space and landscaping improvements, as well as pedestrian enhancements consistent with the LARRMP, including, but not limited to, the publicly-accessible Radford Bridge that would extend from the northern terminus of Radford Avenue north across the Tujunga Wash to Moorpark Street. The Radford Bridge would provide pedestrian and bicycle access across the Tujunga Wash and include ramps and/or stairs to provide direct access to the Los Angeles River trail system. The Radford Bridge would also provide access for studio-related vehicles only. The Project would also support sub-goals of the LARRMP related to enhancing river identity and incorporating public art along the river by providing new and enhanced landscaping within portions of the proposed development areas located to the west of the Tujunga Wash and Los Angeles River, as well as decorative murals, graphics, art installations, or other non-sign graphics celebrating the Los Angeles River. Therefore, the Project would not conflict with the LARRMP.

(d) Conclusion

Based on the analysis provided above, the Project would generally not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Thus, impacts related to conflicts with land use plans would be less than significant.

(2) Mitigation Measures

Project-level impacts with regard to conflicts with applicable land use plans would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts with regard to conflicts with land use plans were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e. Project Impacts with Long-Term Buildout

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.[17] The Development Agreement would confer a vested right to develop the Project in accordance with the Specific Plan and a Mitigation Monitoring Program (MMP) throughout the term of the Development Agreement. The Specific Plan and MMP would continue to regulate development of the Project Site and provide for the implementation of all applicable project design features and mitigation measures associated with any development activities during and beyond the term of the Development Agreement. Additionally, land use impacts do not vary substantially over the course of relatively short time frames (i.e., the 20-year term of the Development Agreement). Therefore, a later buildout date would not affect the impacts or significance conclusions presented above.

f. Cumulative Impacts

(1) Impact Analysis

As discussed in Section III, Environmental Setting, of this Draft EIR, a total of 13 related development projects have been identified in the vicinity of the Project Site through 2028, the Project's anticipated buildout year.[18] The related projects comprise a variety of uses, including residential, commercial, and recreational uses, as well as mixed-use developments incorporating some or all of these elements. The closest related project to the Project Site is Related Project No. 1, located at 4201 Radford Avenue, immediately west of the Project Site along Radford Avenue.

As with the Project, the related projects would be required to comply with relevant land use plans, policies and regulations. Accordingly, as with the Project, the related projects would not conflict with applicable land use plans, policies, and regulations. Specifically, as with the Project, the related projects would be required to comply with certain regulations and City goals, objectives, and policies to reduce emissions during construction, as well as

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[17] *As noted above, construction of the proposed Radford Bridge may be completed after 2028.*

[18] *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. A later buildout date would not affect the cumulative impact analysis related to land use and planning.*

using clean materials and energy efficient appliances, consistent with the Los Angeles Green Building Code. In support of the City's goal to reduce VMT, it is anticipated that the related projects would also implement various methods to promote alternative modes of transportation, including providing bicycle parking spaces, which is a City requirement. **Therefore, overall cumulative impacts related to conflicts with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant.**

(2) Mitigation Measures

Cumulative impacts with regard to land use would be less than significant. Thus, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts with regard to land use were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.