

IV. Environmental Impact Analysis

G. Land Use and Planning

1. Introduction

This section of the Draft EIR analyzes the Project's potential to conflict with applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. The Project's potential impacts regarding the remaining environmental topics related to land use and planning, including the Project's potential to physically divide an established community as well as conflict with an applicable habitat conservation plan were fully evaluated in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR. As concluded in the Initial Study, no further evaluation of these topics in an EIR is required.

2. Environmental Setting

a. Regulatory Framework

(1) Local

At the local level, several plans, policies, and regulatory documents guide development within the City of Los Angeles (City), including the City of Los Angeles General Plan (General Plan) and the City of Los Angeles Municipal Code (LAMC), which governs land use through specific development and design standards and building and safety codes. The Hollywood Community Plan (Community Plan) constitutes the local land use policy standard for the Project Site and Community Plan area. Applicable plans and associated regulatory documents and requirements are described below.

(a) City of Los Angeles General Plan

State law requires that every city and county prepare and adopt a General Plan. A General Plan is a comprehensive long-term planning document that provides principles, policies, and objectives to guide future development.

The City's General Plan, originally adopted in 1974, is a policy document that serves as a comprehensive long-term plan for future development. The General Plan sets forth goals, objectives, and programs to guide land use policies and to meet the existing and future needs of the City. The General Plan includes the seven elements mandated by state

law: Land Use, Circulation, Noise, Safety, Housing, Open Space, and Conservation. In addition, the City's General Plan includes elements addressing Air Quality, Infrastructure Systems, Public Facilities and Services, and Health and Wellness, as well as the Citywide General Plan Framework Element (Framework Element). The General Plan's Land Use Element is composed of 35 local area plans known as Community Plans that guide land use at the community level. As indicated above, the Project Site is located within the boundaries of the Hollywood Community Plan.

(i) City of Los Angeles General Plan Framework Element

The Framework Element, adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the City and defines Citywide policies regarding land use that influence the Community Plans and most of the City's General Plan Elements. Specifically, the Framework Element defines Citywide policies for land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, and infrastructure and public services.

Land Use Chapter

The Land Use Chapter of the Framework Element provides objectives to support the viability of the City's residential neighborhoods and commercial and industrial districts, and to encourage sustainable growth. The Land Use Chapter establishes land use categories that are broadly described by ranges of intensity/density, heights, and lists of typical uses. The designated land use categories are Neighborhood Districts, Community Centers, Regional Centers, Downtown Center, and Mixed-Use Boulevards. These land use categories do not connote land use entitlements or affect existing zoning for properties in the City and serve as guidelines for the Community Plans.¹

Housing Chapter

The Housing Chapter of the Framework Element presents an overview of the critical issues related to housing in Los Angeles, provides goals to guide future action, and sets forth policies to address housing issues. The Housing Chapter's overarching goal is to define the distribution of housing opportunities by type and cost for all residents of the City.

¹ *As indicated in Chapter 1 of the General Plan Framework, the General Plan Framework neither overrides nor supersedes the Community Plans. It guides the City's long-range growth and development policy, establishing citywide standards, goals, policies and objectives for citywide elements and Community Plans. The General Plan Framework is flexible, suggesting a range of uses within its land use definitions. Precise determinations are made in the Community Plans.*

Urban Form and Neighborhood Design Chapter

The Urban Form and Neighborhood Design Chapter establishes the goal of creating a livable City for existing and future residents. Within this chapter, “urban form” is defined as the general pattern of building height and development intensity and the structural elements that define the City physically, such as natural features, transportation corridors, open space, public facilities, as well as activity centers and focal elements. “Neighborhood design” is defined as the physical character of neighborhoods and communities within the City. 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.

Open Space and Conservation Chapter

The Open Space and Conservation Chapter contains goals, objectives, and policies to guide the provision, management, and conservation of public open space resources, address the outdoor recreational needs of the City’s residents, and guide amendments to the General Plan Open Space Element and Conservation Element.

Economic Development Chapter

The Economic Development Chapter seeks to identify physical locations necessary to attract continued economic development and investment to targeted districts and centers. Goals, objectives, and policies focus on retaining commercial uses, particularly within walking distance of residential areas, and promoting business opportunities in areas where growth can be accommodated without encroaching on residential neighborhoods.

Transportation Chapter

The goals of the Transportation Chapter of the Framework Element are to provide adequate accessibility to commerce, work opportunities, and essential services, and to maintain acceptable levels of mobility for all those who live, work, travel, or move goods in the City. The Transportation Chapter includes proposals for major transportation improvements to enhance the movement of goods and to provide greater access to major intermodal facilities, such as the ports and airports. As discussed in the Transportation Chapter of the Framework Element, the goals, objectives, policies, and related implementation programs of the Transportation Chapter are set forth in the Transportation Element of the General Plan adopted by the City in September 1999. As an update to the Transportation Element of the General Plan, the City Council initially adopted Mobility Plan 2035 in August 2015. Mobility Plan 2035 was readopted in January 2016 and again in September 2016. With the updated Transportation Element, the Transportation Chapter of the General Plan Framework Element is now implemented through Mobility Plan 2035.

Infrastructure and Public Services Chapter

The Infrastructure and Public Services Chapter of the Framework Element addresses infrastructure and public service systems, including wastewater, stormwater, water supply, solid waste, police, fire, libraries, parks, power, schools, telecommunications, street lighting, and urban forest. 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). Attention is also placed on the establishment of procedures for the maintenance and/or restoration of service after emergencies, including earthquakes.

The Project's consistency with applicable goals, objectives, and policies in the Framework Element adopted for the purpose of avoiding or mitigating an environmental effect is discussed below in the impact analysis. A detailed discussion of specific goals, objectives, and policies in the Framework Element applicable to the Project is provided in Table 1 of Appendix F of this Draft EIR.

(ii) Los Angeles General Plan Conservation Element

Section 5 of the City's General Plan 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 to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities.² The Project's consistency with applicable policies in the Conservation Element is analyzed in the impact analysis in Subsection 3.c, below.

(iii) Mobility Plan 2035

The overarching goal of Mobility Plan 2035 is to achieve a transportation system that balances the needs of all road users. As an update to the City's General Plan Transportation Element, Mobility Plan 2035 incorporates "complete streets" principles. In 2008, the California State Legislature adopted Assembly Bill 1358, The Complete Streets Act, which requires local jurisdictions to "plan for a balanced, multimodal transportation

² *City of Los Angeles Conservation Element of the General Plan, adopted September 26, 2001, p. II-9.*

network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban or urban context.” Mobility Plan 2035 includes the following five main goals that define the City’s high-level mobility priorities:³

- Safety First;
- World Class Infrastructure;
- Access for All Angelenos;
- Collaboration, Communication, and Informed Choices; and
- Clean Environments and Healthy Communities.

Each of the goals contains objectives and policies to support the achievement of those goals. The Project’s consistency with applicable policies in Mobility Plan 2035 adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below. A detailed discussion of specific policies in Mobility Plan 2035 applicable to the Project is provided in Table 1 of Appendix F of this Draft EIR.

(iv) Hollywood Community Plan

The Project Site is located within the Hollywood Community Plan area. Adopted on December 13, 1988 and currently being updated, the Hollywood Community Plan is one of 35 community plans established for different areas of the City to implement the policies of the Framework Element. The specific purpose of the Hollywood Community Plan is to promote an arrangement of land use, circulation, and services that would encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the Hollywood Community, within the larger framework of the City. In addition, the Hollywood Community Plan serves to guide the development, betterment, and change of the community to meet existing and anticipated needs and conditions, as well as to balance growth and stability, reflect economic potentials and limits, land development and other trends, and to protect investment to the extent reasonable and feasible.

The Community Plan’s land use designation for the Project Site is Limited Manufacturing. The Limited Manufacturing General Plan land use designation corresponds

³ *City of Los Angeles Department of City Planning, Mobility Plan 2035: An element of the General Plan, approved by City Planning Commission on June 23, 2016 and adopted by City Council on September 7, 2016.*

with the MR1, M1, P, and PB zones. The Hollywood Community Plan indicates that much of the land designated for industrial use should continue to be occupied by the types of industry which are indigenous to Hollywood-motion picture and television production, including radio studios, sound and recording studios, film processing studios, and motion picture equipment manufacturing and distribution.

An analysis of the Project's consistency with the applicable land use goals and policies of the Hollywood Community Plan adopted for the purpose of avoiding or mitigating an environmental effect is provided in the impact analysis below. Specific goals and policies of the Hollywood Community Plan applicable to the Project are identified in Table 2 of Appendix F of this Draft EIR.

(b) Community Redevelopment Agency of Los Angeles (CRA/LA) Hollywood Redevelopment Plan

The Hollywood Redevelopment Plan (Redevelopment Plan) was adopted by the City Council on May 7, 1986, and amended on May 2003. The Redevelopment Plan will expire in 2033. The Hollywood Redevelopment Project Area (Redevelopment Area) encompasses approximately 1,107 acres bounded approximately by Franklin Avenue on the north, Serrano Avenue on the east, Santa Monica Boulevard and Fountain Avenue on the south, and La Brea Avenue on the west. The Redevelopment Plan supports the California Community Redevelopment Law and as such, is designed to improve economically and socially disadvantaged areas, redevelop or rehabilitate under or improperly utilized properties, eliminate blight, and improve the public welfare.

On December 29, 2011, the California Supreme Court issued its decision in the *California Redevelopment Association v. Matosantos* case. The decision upheld the recently enacted State law, Assembly Bill (AB) x1 26, dissolving all California redevelopment agencies, including the CRA/LA. The dissolution of the agencies became effective February 1, 2012. AB x1 26, however, did not dissolve the redevelopment plans. Therefore, the Hollywood Redevelopment Plan and its requirements for development are still in effect. As the City declined to be the successor agency to the CRA/LA, a Designated Local Authority (DLA) was formed and the Governor appointed its three member board. The DLA is currently tasked with implementing and enforcing the requirements of the Hollywood Redevelopment Plan. Given the uncertainty regarding the implementation of the land use policies in the Hollywood Redevelopment Plan, this Draft EIR addresses the Project's consistency with CRA/LA plans and design district guidelines, and assumes their applicability until action from the City and/or DLA makes the Hollywood Redevelopment Plan no longer applicable to the Project Site. For purposes of this Draft EIR, any references to the CRA/LA are intended to reference the DLA pursuant to these recent changes.

Section 502 of the Redevelopment Plan provides that “the land uses permitted in the [Redevelopment] Project Area shall be those permitted by the General Plan, the applicable Community Plan, and any applicable City zoning ordinance, all as they now exist or are hereafter amended and/or supplemented from time to time.” Section 502 also establishes a mechanism whereby the land use designations of the Redevelopment Plan are automatically updated to conform to any future changes in the Community Plan. Therefore, the Project Site is designated for Limited Manufacturing land uses by the Redevelopment Plan and the Community Plan. The Hollywood Community Plan Update also retains the Project Site’s Limited Manufacturing designation.

The Project’s consistency with applicable goals in the Hollywood Redevelopment Plan is provided in Table 3 of Appendix F of this Draft EIR and in the impact analysis below in Subsection 3.c.

(c) Los Angeles Municipal Code

The City of Los Angeles Zoning Code (Chapter 1 of the LAMC) regulates development through zoning designations and development standards. The Project Site is zoned M1-1 (Limited Industrial, Height District 1). The M1 Zone permits any commercial land use permitted in the MR1 (Restricted Industrial) and C2 zones, in addition to other specified uses including (but not limited to) foundry, rental of equipment commonly used by contractors, stadiums, arenas, auditoriums, and indoor swap meets. Studio production and office uses are permitted uses within the M1 zone. Height District 1 within the M1 Zone imposes no height limitation and has a maximum Floor Area Ratio (FAR) of 1.5:1. The Project’s consistency with the LAMC is provided in the impact analysis below.

(d) 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 adopted by the City Planning Commission in July 2013, are intended as performance goals and not zoning regulations or development standards and, therefore, do not supersede regulations in the LAMC. As stated in the Citywide Design Guidelines, although each of the Citywide Design Guidelines should be considered in a project, not all of them will be appropriate in every case, as each project will require a unique approach, and “flexibility is necessary and

encouraged to achieve excellent design.”⁴ The City’s Urban Design Studio, which is part of the City of Los Angeles Department of City Planning, considers the Citywide Design Guidelines and other applicable planning documents when reviewing development proposals.⁵ The applicable elements of the Citywide Design Guidelines are discussed in Section IV.A, Aesthetics, of this Draft EIR.

(e) City of Los Angeles Walkability Checklist

The City of Los Angeles Walkability Checklist Guidance for Entitlement Review (Walkability Checklist) is part of a proactive implementation program for the urban design principles contained in the Urban Form and Neighborhood Design Chapter of the Framework Element. Department of City Planning staff use the Walkability Checklist in evaluating a project’s entitlement applications and in making findings of conformance with the policies and objectives of the General Plan and the local community plan. The Walkability Checklist is also intended to be used by architects, engineers, and all community members to create enhanced pedestrian movement, and access, comfort, and safety, thereby contributing to improving the walkability of the City. The City Planning Commission adopted the Walkability Checklist in 2007 and directed that it be applied to all projects seeking discretionary approval for new construction. The final Walkability Checklist was completed in November 2008.⁶

In the field of urban design, walkability is the measure of the overall walking conditions in an area. Different factors have been identified with regard to enhancing walkability in the private versus public realms. Specific factors influencing walkability within the private realm (private areas of projects) include building orientation, building frontages, signage and lighting, on-site landscaping, and off-street parking and driveways. Contributors influencing walkability within the public realm include sidewalks, crosswalks/street crossings, on-street parking, and utilities. Street connectivity, access to transit, aesthetics, landscaping, and street furniture are additional components that are discussed in the Walkability Checklist as they also influence the pedestrian experience.

As with the design principles included in the Urban Form and Neighborhood Design Chapter of the Framework Element, the guidelines provided in the Walkability Checklist are not appropriate for every project. The primary goal is to consider the applicable guidelines

⁴ *City of Los Angeles Department of City Planning, Commercial Citywide Design Guidelines, Pedestrian-Oriented/Commercial and Mixed-Use Projects, May 2011, p. 5.*

⁵ *City of Los Angeles Department of City Planning, Urban Design Studio, <http://urbandesignla.com/about.php>, accessed June 29, 2018.*

⁶ *City of Los Angeles Department of City Planning, Walkability Checklist Guidance for Entitlement Review, November 2008.*

in the design of a project, thereby improving pedestrian access, comfort, and safety in the public realm. The Project's consistency with applicable design guidelines in the Walkability Checklist is discussed in Section IV.A, Aesthetics, of this Draft EIR.

(f) Other City of Los Angeles Environmental Policies, Ordinances, and Plans

The City of Los Angeles has adopted various environmental plans, policies, and ordinances, such as the Los Angeles Green Building Code (Chapter IX, Article 9, of the LAMC), Los Angeles Department of Water and Power 2015 Urban Water Management Plan, Sustainable City pLAN, Green LA (the City's climate action plan), and the Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan. Applicable plans, policies, and ordinances are discussed in their respective environmental topic sections throughout Section IV, Environmental Impact Analysis, of this Draft EIR.

(g) Draft Plans Not Discussed

(i) Hollywood Community Plan Update

The City of Los Angeles Department of City Planning is currently updating and has not yet adopted the Hollywood Community Plan (referred to as HCPU2). The Hollywood Community Plan Update retains the Project Site's Limited Manufacturing designation. The Hollywood Community Plan Update proposes changes that would primarily increase commercial and residential development potential in and near the Regional Center Commercial portion and along selected corridors of the Hollywood Community Plan area. Decreases in development potential would be primarily focused on low- to medium-scale multi-family residential neighborhoods to conserve the existing density and intensity of those neighborhoods.

(2) Regional

Applicable regional land use plans include the Southern California Association of Governments (SCAG) 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS) and Regional Comprehensive Plan; and the Los Angeles County Congestion Management Program, administered by the Los Angeles County Metropolitan Transportation Authority (Metro). In addition, the South Coast Air Quality Management District (SCAQMD) administers the Air Quality Management Plan, which addresses the attainment of State and federal ambient air quality standards throughout the South Coast Air Basin. These plans are described below.

(a) *Southern California Association of Governments*

SCAG is the federally designated Metropolitan Planning Organization for six Southern California counties, including the County of Los Angeles. As such, SCAG is mandated to create regional plans that address transportation, growth management, hazardous waste management, and air quality.

SCAG's 2016–2040 RTP/SCS, adopted on April 7, 2016, presents a long-term transportation vision through the year 2040 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. The mission of the 2016–2040 RTP/SCS is to provide “leadership, vision and progress which promote economic growth, personal well-being, and livable communities for all Southern Californians.” The 2016–2040 RTP/SCS places a greater emphasis on sustainability and integrated planning compared to previous versions of the RTP, and identifies mobility, accessibility, sustainability, and high quality of life, as the principles most critical to the future of the region. Further, it balances the region's future mobility and housing needs with economic, environmental, and public health goals. As stated in the 2016–2040 RTP/SCS, Senate Bill 375 requires SCAG and other Metropolitan Planning Organizations throughout the state to develop a Sustainable Communities Strategy to reduce per capita greenhouse gas emissions through integrated transportation, land use, housing and environmental planning.⁷ Within the 2016–2040 RTP/SCS, the overarching strategy includes plans for “High Quality Transit Areas,” “Livable Corridors,” and “Neighborhood Mobility Areas” as key features of a thoughtfully planned, maturing region in which people benefit from increased mobility, more active lifestyles, increased economic opportunity, and an overall higher quality of life.⁸ High-Quality Transit Areas (HQTA) are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.⁹ Livable Corridors are arterial roadways where local jurisdictions may plan for a combination of the following elements: high-quality bus frequency, higher density residential and employment at key intersections, and increased active transportation through dedicated bikeways. Neighborhood Mobility Areas are areas with roadway networks where Complete Streets and sustainability policies support and encourage replacing single and multi-occupant automobile use with biking, walking, skateboarding, and slow speed electric vehicles. Local jurisdictions are encouraged to focus housing and

⁷ SCAG 2016–2040 *Regional Transportation Plan/Sustainable Communities Strategy*, p. 166.

⁸ SCAG 2016–2040 *Regional Transportation Plan/Sustainable Communities Strategy*, p. 2.

⁹ SCAG 2016–2040 *Regional Transportation Plan/Sustainable Communities Strategy*, p. 189.

employment growth within High-Quality Transit Areas.¹⁰ The Project Site is located within a designated High-Quality Transit Area under the 2016–2040 RTP/SCS.¹¹

The Project's consistency with the applicable goals of the 2016–2040 RTP/SCS is discussed in the impact analysis below. A list of the specific goals of the 2016–2040 RTP/SCS applicable to the Project is included in Table 4 of Appendix F of this Draft EIR.

(b) South Coast Air Quality Management District Air Quality Management Plan

The SCAQMD was established in 1977 pursuant to the Lewis-Presley Air Quality Management Act. The SCAQMD is responsible for developing plans for ensuring air quality in the South Coast Air Basin conforms with federal and state air pollution standards. In conjunction with SCAG, the SCAQMD has prepared the 2016 Air Quality Management Plan establishing a comprehensive regional air pollution control program including air pollution control strategies leading to the attainment of state and federal air quality standards in the South Coast Air Basin. Refer to Section IV.B, Air Quality, of this Draft EIR for an analysis of the Project's consistency with the Air Quality Management Plan.

(c) Los Angeles County Metropolitan Transportation Authority Congestion Management Program

Metro administers the Congestion Management Program, a State-mandated program designed to provide comprehensive long-range traffic planning on a regional basis. The Congestion Management Program, revised in 2010, includes a hierarchy of highways and roadways with minimum level of service standards, transit standards, a trip reduction and travel demand management element, a program to analyze the impacts of local land use decisions on the regional transportation system, a seven-year capital improvement program, and a county-wide computer model used to evaluate traffic congestion and recommend relief strategies and actions. The Congestion Management Program guidelines specify that those designated roadway intersections to which a project could add 50 or more trips during either the A.M. or P.M. peak hour be evaluated. The guidelines also require the evaluation of freeway segments to which a project could add 150 or more trips in each direction during peak hours. Refer to Section IV.J, Transportation, of this Draft EIR, for further discussion of the Project's consistency with the Congestion Management Program.

¹⁰ SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 76.

¹¹ SCAG, *The 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy: A Plan for Mobility, Accessibility, Sustainability and a High Quality of Life*, adopted April 2016, Exhibit 5.1.

b. Existing Conditions

(1) Project Site

The Project Site is an existing major motion picture and television studio. Existing development within the Project Site includes creative office space, production support, sound stages, and restaurant space. Currently, activities on the Project Site include the production of motion pictures, television, and commercials on indoor and outdoor sets, and in production offices, as well as recording activities. These activities include pre-production and post-production activities, and related administrative functions. The Project Site operates 24 hours a day. Filming activities may occur at any time of day and any day of the week, including evenings and weekends. Most filming is closed to the public.

The Project Site includes three parking structures providing a total of 1,398 parking spaces. The Project Site also includes approximately 1,400 square feet of service areas.

The Project Site contains limited to sparse landscaping in the form of non-native/non-protected trees,¹² hedges, and shrubs. The Project Site is enclosed with restricted access and on-site security, with access limited to the tenants and their guests.

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

(2) Surrounding Uses

The Project Site is within the highly urbanized Hollywood Community Plan Area. Land uses surrounding the Project Site include retail and restaurant uses within the Sunset Gower Plaza, Siren Studios, a motel, and other commercial/retail uses to the north, along Sunset Boulevard; the EastWest Studios, Emerson College, and single- and multi-family residential uses to the east, along Gordon Street; single- and multi-family residential and commercial uses to the south, along Fountain Avenue; and commercial, retail, restaurant, and multi-family residential uses to the west, along Gower Street.

¹² *The City of Los Angeles Protected Tree Regulations apply to Oak, Southern California Black Walnut, Western Sycamore, and California Bay tree species that are native to Southern California, and excludes trees grown by a nursery or trees planted or grown as part of a tree planting program.*

3. Project Impacts

a. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, 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.

For this analysis, the Appendix G Thresholds listed 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 criteria to evaluate land use impacts:

(1) 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.

(2) Land Use Compatibility

- The extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area;
- The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided, or isolated, and the duration of the disruptions; and
- The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the project.

b. Methodology

State 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:

“...if 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.”

Analysis of conflicts and consistency with applicable plans is included in this section of the Draft EIR. 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. 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.¹³ 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. Specifically, according to the ruling in *Sequoiah 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.¹⁴

c. Project Design Features

No specific project design features beyond the proposed improvements discussed in Section II, Project Description, of this Draft EIR, and summarized below are proposed with regard to land use.

¹³ Office of Planning and Research (OPR), *State of California General Plan Guidelines (2017)*

¹⁴ *Sequoiah Hills Homeowners Association v. City of Oakland (1993) 23 Cal.App.4th 704, 719.*

d. Analysis of Project Impacts

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

As discussed in Section VI, Other CEQA Considerations, and in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, the Project proposes the preservation and enhancement of portions of the existing Sunset Gower Studios, which is located in a highly urbanized area characterized by a mix of neighborhood-serving commercial/retail uses, tourist and entertainment-related commercial/retail uses, offices, hotels, educational institutions, and single-family and multi-family residences. All proposed development would occur within the boundaries of the Sunset Gower Studios, which is fully developed. In addition, the Project does not propose a freeway or other large infrastructure or barrier that would divide a community. The Project would not substantially or adversely change the existing land use relationships in the vicinity of the Project Site or have the long-term effect of adversely altering a neighborhood or community through on-going disruption, division, or isolation of any uses. **Therefore, as determined in the Initial Study, 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) City of Los Angeles General Plan

(i) Los Angeles General Plan Framework Element

The Project's general consistency with the applicable goals, objectives, and policies set forth in the General Plan Framework Element is analyzed in Table 1 of Appendix F of this Draft EIR. Provided below is a general discussion of whether the Project would conflict any applicable goals, objectives, and policies of the General Plan adopted for the purpose of avoiding or mitigating an environmental effect.

Land Use Chapter

The Project would not conflict with the General Plan Framework Element Land Use Chapter as the Project would accommodate new development within the existing Sunset Gower Studios in accordance with land use and density provisions of the General Plan Framework. Specifically, the proposed studio-related creative office and production office/production support uses would be consistent with existing land use provisions and would be within the maximum floor area ratio permitted of 1.5:1. The Project would also

provide for a development that reduces vehicle trips, vehicle miles traveled, and air pollution by constructing compatible uses within one site and in a community that would complement the established skill set of the local area's employment base, thus reducing the need for such employees to travel greater distances for employment opportunities. In addition, the Project Site is located in proximity to several transit options, which would facilitate use of other transportation options and reduce vehicle trips.

Urban Form and Neighborhood Design Chapter

The Project would not conflict with applicable objectives and policies that support the goals established in the General Plan Framework's Urban Form and Neighborhood Design Chapter. In particular, the Project would not conflict with the objective of the General Plan Framework's Urban Form and Neighborhood Design Chapter 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 the existing entertainment-related uses in Hollywood. Specifically, the Project would introduce additional studio/media/entertainment-related office and production support space on a site traditionally occupied by studio uses that is located along a major transportation corridor, Sunset Boulevard. In addition, the Project would enhance the livability of the surrounding neighborhood with the development of Building A, which would create a central visual focal point for the Project Site along Sunset Boulevard and improve the walkability of Sunset Boulevard through the creation of visual interest and pedestrian friendly design. Additionally, Building B and Building C would contain landscaped terraces as well as pedestrian-scaled elements at street level, which would provide further articulation to the building façades. The new parking structure would also replace a surface staging/service area at the corner of Gordon Street and Fountain Avenue and a two-story office building located on Gordon Street. The existing chain-link fence and masonry wall along Gordon Street and Fountain Avenue would also be removed. The parking structure would be constructed of polycarbonate panels and vertical black metal fins, and would incorporate extensive landscaping within a 16-foot setback at the corner of Gordon Street and Fountain Avenue, providing a buffer between the residential uses to the south and the new parking structure and enhancing the pedestrian experience. The Project would also include improvements to the three existing parking structures along Gordon Street, consisting of cosmetic improvements to the façades of the structures and the installation of landscaping. This would visually integrate all of the existing and proposed parking structures, thereby creating a more visually unified streetscape. The Project would further encourage the establishment of a strong pedestrian orientation of the area through the planting of new trees along Gower Street, Fountain Avenue, and Gordon Street. The Project would also encourage proper design to help increase personal safety by providing for the installation and use of a 24-hour security camera system throughout the Project; providing lighting of buildings and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings; providing lighting of parking areas to maximize visibility and reduce areas of concealment;

and designing entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites.

Economic Development Chapter

The Project would not conflict with applicable objectives and policies that support the goals established in the General Plan Framework's Economic Development Chapter. Specifically, the Project would support the City's objective to establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents and sustains economic growth by constructing studio-related office and production support space that expand upon the existing entertainment-related uses in Hollywood. The proposed uses would be constructed within the existing Sunset Gower Studios, a site traditionally occupied by studio-related uses, thus increasing the production capacity of the Studios and sustaining economic growth. In addition, the proposed uses would complement the established skill set of the local area's employment base.

Transportation Chapter/Mobility Plan 2035

The Project would not conflict with applicable policies that support the goals and objectives established in the General Plan Framework's Transportation Chapter, which encompasses the City's Mobility Plan 2035. The Project would support the City's policy to design detour facilities to provide safe passage for all modes of travel during construction through the implementation of a Construction Management Plan, as set forth in Project Design Feature TR-PDF-1, that would provide temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities adjacent to Sunset Boulevard and Gordon Street. The Project would promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs through the development of additional studio/media/entertainment-related office and production support space on a site traditionally occupied by studio-related uses. The proposed uses would complement the established skill set of the local area's employment base, thus reducing the need for such employees to travel greater distances for employment opportunities. Furthermore, the Project would encourage greater utilization of TDM strategies to reduce dependency on single-occupancy vehicles, consistent with the City's policy, by implementing a TDM Program that would identify measures to reduce peak-hour vehicular traffic to and from the Project Site.

Infrastructure and Public Services Chapter

The Project would not conflict with applicable policies that support the goals established in the General Plan Framework's Infrastructure and Public Services Chapter. Specifically, the Project would support the City's objective to pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality by maintaining the existing percentage of impervious surfaces within the Project Site, which would not create

new potential for runoff water to exceed the capacity of existing stormwater drainage systems. In addition, with the addition of landscaping, which would serve to retain stormwater runoff, post-development runoff flows would actually decrease from 44.27 cubic feet per second to 43.75 cubic feet per second during a 50-year storm event. The Project would also implement BMPs to filter, treat, and reduce stormwater pollutants prior to discharge from the Project Site, in accordance with the City's LID requirements. In accordance with the City's objective to ensure adequate water supplies, storage, and delivery systems, through preparation of the Water Supply Assessment for the Project the LADWP has found that it would be able to meet the water demand of the Project as well as the existing and planned future water demands of its service area. Furthermore, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site.

(ii) Conservation Element

As discussed in Section IV.C, Cultural Resources, of this Draft EIR, the Sunset Gower Studios includes a potential Historic District as well as individually historic buildings. The potential historic district consists of 35 buildings within the Sunset Gower Studios. The Project would demolish 15 buildings within the boundary of the potential historic district. As such, 20 buildings would remain within the potential historic district. Of the 15 buildings to be removed, six buildings are contributors and nine buildings are non-contributors. The integrity of three of the contributors is considered "fair" and the integrity of the remaining three contributors to be removed is considered "good." With removal of the six contributing buildings, the potential historic district would consist of 22 buildings, including 16 contributors and six non-contributors, resulting in a potential historic district with 73 percent contributing resources. For this to be considered a "substantial adverse change", it must be shown that the removal of the six contributing buildings would result in the physical alteration of the potential historic district such that its ability to convey its historical significance and eligibility for historic listing would be threatened. As evaluated in Section IV.C, Cultural Resources, of this Draft EIR, after implementation of the Project, the potential historic district would continue to retain a concentration of buildings that date from the period of significance and reflect the historic identity of Columbia Studios as a "Big Eight" motion picture studio operating during the Major Studio Era. These buildings represent a large majority of the existing contributing square footage and highest levels of integrity among the contributing buildings. The important configuration of buildings, spatial relationships and circulation patterns that are characteristic of the Columbia Studios era and contribute to the historic character of the site would also remain after implementation of the Project. The contributing buildings to remain also include all contributors located on the western edge of the property facing Gower Street, which is the only portion of the potential historic district directly visible to the public. In addition, the proposed locations for new construction are either located outside of the potential historic district or generally retain the existing historic spatial and circulation patterns. As concluded in Section IV.C, Cultural Resources, of this Draft EIR, the proposed removal of contributing buildings to the potential

historic district would not reduce the integrity of the potential historic district such that it can no longer convey its historic significance. Therefore, removal of contributing buildings caused by the Project would not result in significant impacts to historic resources.

Regarding individually historic buildings within the Sunset Gower Studios, the Historical Resources Report identified three buildings on the Project Site that are eligible for historic listing as individual properties. These include the United Recorders building at 6050 Sunset Boulevard; the single-story brick building at 1455 North Gordon Street; and the five-story office building at 1440 Gower Street (Building 35), which is also a contributor to the Historic District. The Project would demolish the United Recorder Building at 6050 Sunset Boulevard, which is eligible for listing in the National Register, California Register, and as a Los Angeles Historic-Cultural Monument for its association with the music recording industry in Los Angeles. Demolition of this building would result in significant impacts to a historic resource. This impact cannot be mitigated to a less-than-significant level.

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

(b) Hollywood Community Plan

An analysis of the Project's consistency with the applicable land use objectives and policies of the Hollywood Community Plan is provided in Table 2 of Appendix F of this Draft EIR. As provided therein, the Project would not conflict with the applicable objectives and policies of the Hollywood Community Plan adopted for the purpose of avoiding or mitigating an environmental effect. In particular, the Project would support the objective of the Community Plan to make provision for a circulation system coordinated with land uses and densities that are adequate to accommodate traffic. The Project would be served by the existing transportation infrastructure and would result in less than significant transportation

impacts. In addition, the Project would promote the Community Plan's objective to occupy industrial uses with the types of industries which are indigenous to Hollywood, such as motion picture and television production, radio studios, sound and recording studios, film processing studios, and motion picture equipment manufacturing and distribution. As previously discussed, the Project Site is located along a portion of Sunset Boulevard that is highly urbanized with a high concentration of entertainment industry uses. The Project is designed to meet the evolving needs of the entertainment industry, which has been vital to the character, economic health, and social identity of Hollywood. As such, the Project would be consistent with the Project Site's land use designation and would help to retain industry that is indigenous to Hollywood.

(c) Hollywood Redevelopment Plan

Section 411 of the Redevelopment Plan provides that "the entertainment industry and related use have in the past been dominant in the economy of Hollywood providing the impetus for initial residential, commercial and industrial growth in Hollywood." It also states that "in order to ensure the future of the industry in Hollywood and the employment it provides the Agency shall develop an economic development strategy to provide for the attraction, retention and expansion of the entertainment industry and related uses in Hollywood." The Project would contribute to additional entertainment industry growth in Hollywood by developing entertainment-related uses, including studio-related creative office and production office/production support uses, uses which are compatible and related entertainment industry uses.

Section 502 of the Redevelopment Plan provides in part "the land use permitted in the [redevelopment] Project Area shall be those permitted by the General Plan, and the applicable Community Plan, and any applicable City zoning ordinance." As indicated above, the General Plan land use designation and zoning for the Project Site is Limited Manufacturing and M1-1 (Limited Industrial), respectively. Pursuant to Section 507.2 of the Redevelopment Plan, Limited Industrial uses include but are not limited to uses such as: television, video, radio, and motion picture production, machine and woodworking shops, electronic instrument and electrical appliance manufacturing, pharmaceuticals manufacturing, and other related and compatible uses. The proposed entertainment-related uses would provide commercial space related to the entertainment uses on the Project Site. These uses would allow the Applicant to expand its studio operations to meet the evolving demands of the entertainment industry.

The Project's consistency with applicable goals set forth in the Hollywood Redevelopment Plan is provided in Table 3 of Appendix F of this Draft EIR. Provided below is a general discussion of whether the Project would conflict any applicable goals, objectives, and policies of the Hollywood Redevelopment Plan adopted for the purpose of avoiding or mitigating an environmental effect.

The Project represents a private sector development that would expand upon the existing entertainment-related uses in the Hollywood area by providing studio-related creative office and production office/production support uses. The Project would expand entertainment-related uses as well as promote a positive image for Hollywood that recognizes the area as the center of the entertainment industry and a tourist destination. Moreover, by providing entertainment-related office and production support uses, the Project would expand upon the existing and historic uses in the Hollywood area and allow the Sunset Gower Studios to meet the evolving needs of the entertainment industry for enhanced post-production facilities, compatible office space, and other studio/media/entertainment-related facilities. The Project would also be located in close proximity to transit options and would provide adequate parking. However, as discussed in Section IV.C, Cultural Resources, of this Draft EIR, the Project would involve the removal of the United Recording building at 6050 Sunset Boulevard, which is eligible for listing in the National Register, California Register, and as a Los Angeles Historic-Cultural Monument for its associations with the music recording industry in Los Angeles. Although, the Project would maintain the integrity of the potential historic district in support of these goals, the removal of the United Recorder Building at 6050 Sunset Boulevard would not be consistent with the Hollywood Redevelopment Plan's goals related to the preservation of landmarks and the retention and restoration of existing buildings, especially those having significant historic and/or architectural value. As discussed above, the *Sequoyah Hills Homeowners Association v. City of Oakland* court case ruled that a Project is not required to be an exact match to the objectives and policies of the General Plan to not pose a conflict. Refer to Section IV.C, Cultural Resources, of this Draft EIR, for an analysis of the Project's impacts to historical resources.

(d) *Los Angeles Municipal Code*

The general purpose and intent of the zoning regulations is to promote consistent, compatible land use and development and to ensure that the health and safety of the surrounding community is not negatively impacted by potentially incompatible land uses.

The Project Site is zoned M1-1 pursuant to the LAMC. The M1 (Limited Industrial) zone permits any use permitted in the MR1 (Restricted Industrial) zone—provided that all regulations of the zone are complied with, except that front yard setbacks are not required—and any enclosed use permitted in the C2 (Commercial) zone. Example land uses permitted in the M1 zone include media products, machine shops, wireless telecommunications, and limited commercial and manufacturing uses. The “-1” component of the Project Site's zoning designation indicates the Project Site is located in Height District 1, which permits a maximum FAR of 1.5:1, with no limit on building height.

The Project Site is currently improved with motion picture, television studio, and recording uses, which are permitted under the current zoning designation. The proposed

studio/media/entertainment-related office uses would be consistent with the existing zoning and would not represent a change in use for the Sunset Gower Studios.

The Project would also be within the maximum FAR permitted for the Project Site. Specifically, the Project would remove 160,611 square feet of existing floor area and develop 627,957 square feet of floor area, resulting in a net increase of approximately 467,346 square feet of floor area. When averaged across the 15.9-acre portion of the Project Site for which entitlements are requested, the 15.9-acre portion of the Project Site would have a FAR of 1.47:1, which would be below the existing FAR limitation of 1.5:1.¹⁵ As a result, the Project would not exceed the floor area permitted within the Project Site.

With respect to setback regulations, buildings erected and used exclusively for commercial or industrial purposes in the M1 zone do not require front, side, or rear yard setbacks. The Project would also comply with the LAMC with regard to parking.

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

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

The Project's general consistency with the applicable goals and principles set forth in the 2016 RTP/SCS is analyzed in Table 4 of Appendix F of this Draft EIR. As described therein, the Project would not conflict with the applicable goals and principles set forth in the 2016–2040 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support the goals of the 2016–2040 RTP/SCS to maximize the productivity of the region's transportation system as well as protect the environment and health of the region's residents by improving air quality and encouraging active transportation (e.g., bicycling and walking). The Project would be developed within an existing urbanized area that provides an established network of roads and freeways that provide local and regional access to the area, including the Project Site. In addition, the Project Site is served by a variety of nearby mass transit options, including a number of bus lines. The availability and accessibility of public transit in the vicinity of the Project Site is documented by the Project Site's location within a designated SCAG High-Quality Transit Area and City of Los Angeles Transit Priority Area, as defined in the

¹⁵ *The Project's FAR is calculated based on the 15.9-acre portion of the Project where new buildings are proposed and across which the floor area is being averaged, which is the only portion of the Project Site owned by the Applicant, and the portion of the Project Site to which the entitlements are being sought.*

City's Zoning Information File No. 2452. In addition, the Project would provide bicycle parking spaces for the proposed uses that would serve to promote walking and use of bicycles. The Project would also include adequate parking to serve the proposed uses and would provide charging stations to serve electric vehicles. In addition, a Transportation Demand Management program is also proposed as part of the Project that would include strategies to promote non-automobile travel and reduce the use of single-occupant vehicle trips, thereby facilitating a reduction in vehicle miles traveled and improved air quality to contribute to the protection of the environment and the health of the community's residents.

(f) Conclusion Regarding Impacts Relative to Land Use Plan Conflicts

Based on the analysis provided above and in Appendix F of this Draft EIR, the Project would not result in a significant environmental impact as a result of conflict with policies, plans, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. As such, impacts would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts related 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. Cumulative Impacts

(1) Impact Analysis

There are numerous related projects located within a few blocks of the Project Site, as shown in Figure III-1 in Section III, Environmental Setting, of this Draft EIR. The proposed developments are comprised of a variety of uses, including apartments, condominiums, restaurants, hotels, office, and retail uses, as well as mixed-use developments incorporating some or all of these elements. Due to the highly urbanized Hollywood Community Plan area, many of the related projects would be infill developments that would be constructed within sites currently or previously constructed with other uses. As with the Project Site, each related project site has an established land use designation and zoning that regulates development type and intensity. Any proposed development within the related project sites would be required to comply with the established land use designation and zoning for that site or would have to undergo environmental review to

deviate from the established land use and zoning standards. In any case, each related project would be reviewed by various City departments to ensure compliance and to ultimately be provided with building permits to construct the proposed development. Therefore, as with the Project, the related projects would be required to comply with relevant land use policies and regulations through review by City regulatory agencies, and would be subject to CEQA review. Thus, the related projects are not expected to be in substantial conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the related project sites. Rather, the concentration of the known development in the area would be expected to promote a more cohesive, compatible and active urban environment that would promote many of the City's goals, objectives, and policies to increase housing and business opportunities while reducing vehicle miles traveled and air pollution. **As such, cumulative impacts related to conflicts with land use plans would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Cumulative impacts related 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.