I. Executive Summary

I. Executive Summary

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15123, this section of this Draft Environmental Impact Report (EIR) contains a brief summary of the proposed TVC 2050 Project (Project) and its potential environmental effects. More detailed information regarding the Project and its potential environmental effects is provided in the following sections of this Draft EIR. Also included in this section is an overview of the purpose and focus of this Draft EIR, a description of the organization of this Draft EIR, a general description of the Project, a general description of areas of controversy, a description of the public review process for this Draft EIR, a list of the Project design features and mitigation measures to be implemented as part of the Project, and a summary of the alternatives to the Project evaluated in this Draft EIR, including identification of the Environmentally Superior Alternative.

1. Purpose of this Draft EIR

As described in Section 15121 of the CEQA Guidelines, an EIR is an informational document that will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. Therefore, the purpose of this Draft EIR is to focus the discussion on the Project's potential environmental effects that the City of Los Angeles (City), as the Lead Agency, has determined to be, or potentially may be significant. Feasible mitigation measures are recommended, when applicable, that could reduce or avoid the Project's significant environmental impacts.

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

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

In accordance with Section 15128 of the CEQA Guidelines, an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were

determined not to be significant and not discussed in detail in the Draft EIR. An Initial Study was prepared for the Project and a Notice of Preparation (NOP) was distributed for public comment to the State Clearinghouse, Governor's Office of Planning and Research, responsible agencies, and other interested parties on July 2, 2021, for a 30-day review period. In addition, a public scoping meeting for the Project was held on July 20, 2021. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City determined through the Initial Study the potential for significant impacts in the following environmental issue areas:

- Air Quality
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services (including Fire Protection and Police Protection)
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems (including Water Supply and Infrastructure, Wastewater, and Electric Power, Natural Gas, and Telecommunications Infrastructure)

The City determined through the Initial Study that the Project would not have the potential to cause significant impacts related to aesthetics; agriculture and forestry resources; odors; biological resources; human remains; landslides; soil erosion; soils incapable of supporting septic tanks; airport or airstrip-related hazards; an emergency response plan or emergency evacuation plan; wildland fires; water quality control plans or sustainable groundwater management plans; physical division of an established

community; mineral resources; airport or airstrip-related noise; population and housing; schools; parks; libraries; recreation; transportation hazards due to a geometric design feature; inadequate emergency access; solid waste; and wildfire. Therefore, these topics are not further analyzed in this Draft EIR. The Initial Study, which is included in Appendix A of this Draft EIR, demonstrates that no significant impacts would occur relative to these environmental areas.

3. Draft EIR Organization

This Draft EIR is comprised of the following sections:

I. Executive Summary. This section describes the purpose of this Draft EIR, Draft EIR focus and effects found not to be significant, Draft EIR organization, thresholds of significance, existing conditions, Project summary, areas of controversy, public review process, summary of environmental impacts, Project design features, mitigation measures, and summary of alternatives.

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

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

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

V. Alternatives. This section provides an analysis of a reasonable range of alternatives to the Project, including: Alternative 1, No Project/No Build Alternative; Alternative 2, Development in Accordance with Existing Zoning Alternative; Alternative 3, Reduced Density Alternative; Alternative 4, Mixed-Use Alternative; and Alternative 5, Above-Ground Parking Alternative.

VI. Other CEQA Considerations. This section provides a discussion of significant unavoidable impacts that would result from the Project and the

reasons why the Project is being proposed notwithstanding the significant unavoidable impacts. An analysis of the significant irreversible changes in the environment and potential secondary effects that would result from the Project is also included. This section also analyzes potential growth-inducing impacts of the Project and potential secondary effects caused by the implementation of the mitigation measures for the Project. Lastly, a summary of the possible effects of the Project that were determined not to be significant within the Initial Study is provided.

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

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

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

This Draft EIR includes the following appendices to support the environmental analyses prepared for the Project:

- Appendix A—Initial Study, Notice of Preparation (NOP), and NOP Comment Letters
  - Appendix A.1—Initial Study
  - Appendix A.2—Notice of Preparation
  - Appendix A.3—NOP Comment Letters
- Appendix B—Air Quality and Greenhouse Gas Emissions
  - Appendix B.1—Air Quality and Greenhouse Gas Emissions Methodology
  - Appendix B.2—Air Quality Worksheets and Modeling Output Files
  - Appendix B.3—Greenhouse Gas Worksheets and Modeling Output Files
- Appendix C—Cultural and Tribal Cultural Resources
  - Appendix C.1—Historical Resources Technical Report
  - Appendix C.2—Tribal Cultural Resources Report
  - Appendix C.3—AB 52 Notification Letter and Delivery Confirmations

  - Appendix C.4—Historic Sign Guidelines
- Appendix D—Energy Calculations
- Appendix E—Geology and Soils
  - Appendix E.1—Preliminary Geotechnical Engineering Investigation
  - Appendix E.2—Soils Report Review Letter
  - Appendix E.3—Addendum I—Response to Soils Report Review Letter
  - Appendix E.4—Soils Report Approval Letter
  - Appendix E.5—Addendum II—Additional Geotechnical Comments
- Appendix F—Paleontological Resources Review Memorandum
- Appendix G— Hazards and Hazardous Materials
  - Appendix G.1— Site Summary Report and Soil Management Plan
  - Appendix G.2— Phase I Environmental Site Assessment
- Appendix H— Hydrology and Water Quality Report
- Appendix I—Land Use Plans Consistency Analysis Tables
- Appendix J—Noise Calculation Worksheets
- Appendix K—Los Angeles Fire Department Response Letter
- Appendix L—Los Angeles Police Department Response Letter
- Appendix M—Transportation
  - Appendix M.1—Transportation Assessment
  - Appendix M.2—Los Angeles Department of Transportation Assessment Letter for the Transportation Assessment
  - Appendix M.3—Supplemental VMT Analysis Memo
  - Appendix M.4—Los Angeles Department of Transportation Assessment Letter for the Supplemental VMT Analysis Memo
  - Appendix M.5—Los Angeles Department of Transportation Haul Route Approval Letter

- Appendix N—Water Supply Assessment
- Appendix O—Utility Infrastructure Technical Report: Water, Wastewater and Energy
- Appendix P—Alternatives
  - Appendix P.1—Alternative 4 Air Quality
  - Appendix P.2—Alternatives Traffic Memo

4. Thresholds of Significance

In 2006, the City published the L.A. CEQA Thresholds Guide (Thresholds Guide) as a guidance document for preparing CEQA analyses for projects within the City. The Thresholds Guide includes two sets of criteria to evaluate project impacts: screening criteria, which provide direction in determining the appropriate environmental document required for a project; and significance thresholds, which assist in determining whether a project's impacts generally would be significant under normal circumstances and would therefore require mitigation. Although intended as a voluntary tool, the Thresholds Guide offers a consistent set of evaluation criteria applicable to most discretionary projects in the City, and the Los Angeles Department of City Planning has typically used both the screening criteria and significance thresholds as the basis for project analyses in its CEQA documents. However, the Thresholds Guide clearly indicates that the Lead Agency—in this case, the Department of City Planning—retains the authority to determine significance thresholds on a case-by-case basis, dependent upon unique environments, evolving regulatory requirements, and the nature of each project. In addition, the Thresholds Guide states it is not intended as a substitute for the use of independent judgment to determine significance or the evaluation of the evidence in the record. Moreover, it states "[b]ecause evaluation practices continue to evolve due to changing regulations, scientific methods, and court decisions, the project evaluator and lead City agency should always use the best information and evaluation methods available, including those from sources other than the Thresholds Guide."[1]

In light of an evolving regulatory environment, recent case law, new topics such as GHG emissions and tribal cultural resources that are now addressed in Appendix G of the CEQA Guidelines (Appendix G), and the age of the Thresholds Guide, the Department of City Planning has begun to update its CEQA guidance. At this point in time, the Department of City Planning has chosen to rely on the Appendix G questions as thresholds of significance. As noted above, the City has discretion in choosing appropriate

[1] City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, p. 3.

significance thresholds. Therefore, throughout this Draft EIR, the thresholds contained in Appendix G are used. The factors and considerations set forth in the Thresholds Guide are utilized where appropriate to assist in answering the Appendix G threshold questions.

5. Project Site Background and Existing Conditions

Television City is an approximately 25-acre site located at the southeast corner of the intersection of Beverly Boulevard and Fairfax Avenue in the Beverly-Fairfax district of the City of Los Angeles (City). More specifically, the Project Site is comprised of four contiguous parcels located at 7800 and 7860 West Beverly Boulevard (APN 5512-001-003); 7716 and 7720 West Beverly Boulevard (APN 5512-002-002); 7718 West Beverly Boulevard (APN 5512-002-001 in Los Angeles County); and lastly, an adjacent parcel without a physical address (APN 5512-002-009). The Project Site is bounded by Beverly Boulevard to the north; The Grove Drive to the east; a private drive to the south (the eastern portion of which is referred to herein as the Southern Shared Access Drive, which is accessed from The Grove Drive) which separates the Project Site from the adjacent commercial properties to the south;[2] and Fairfax Avenue to the west. The Project Site is located in the Wilshire Community Plan (Community Plan) area of the City. An approximately 0.63-acre portion of the Project Site (APN 5512-002-001) is located outside the City boundary in unincorporated Los Angeles County (County) and is proposed for annexation to the City.

The Project Site is currently developed with approximately 743,680 square feet of studio-related uses, including approximately 95,540 square feet of sound stage uses; 325,450 square feet of production support uses, such as storage and mills; 163,090 square feet of production office space; and 159,600 square feet of general office space. As shown in the aerial photograph provided in Section II, Project Description, of this Draft EIR, the existing development is comprised of four main buildings. The Project Site also contains approximately 30 one-story ancillary buildings and structures, primarily located in the southeastern corner, including storage buildings, modular/portable bungalows and trailers, shelters and pads for utilities and transmission equipment, carports with solar panels, guard houses, and a helipad.

Television City supports a variety of production activities focused on the creation, development, recording, broadcasting, and editing of recorded and live television programming and other audio, visual, and digital media including, but not limited to,

[2] The Southern Shared Access Drive is a privately owned right-of-way that is partially located on the Project Site and partially located off-site on the adjacent properties to the south. While not a component of the Project, the Southern Shared Access Drive provides shared access to the Project Site and the adjacent properties to the south from The Grove Drive.

e-sports, backlot shooting, and other forms of content creation. Such activities occur both indoors and outdoors within the Project Site and include basecamp areas where mobile facilities such as trucks, generators, and support vehicles related to production are temporarily staged. As is typical of studio environments, the land uses are centered around production operations, including associated parking, loading, storage, and related basecamp activities. Basecamps are defined areas at, near, or within a filming location where critical production activities can be coordinated. These areas provide for active uses (including, but not limited to, loading, wardrobe, hair, make-up, craft service, etc.) and passive uses (including, but not limited to, parking, storage of mobile facilities, power generators, support vehicles, etc.) all related to production activities. Within the Project Site, basecamp activities typically occur within existing surface parking areas and other open space areas.

Television City was originally developed in 1952 in accordance with a master plan designed by the local architectural team of William Pereira and Charles Luckman (Pereira & Luckman). The master plan was conceived to function as a plan for a major studio headquarters located within a flexible studio environment and was designed to be adaptable and expandable over time to meet the changing needs of the entertainment industry. The original Primary Studio Complex, located generally in the center of the Project Site, includes two attached buildings designed in the International style—the Service Building on the east and the Studio Building on the west—which together are designated as HCM No. 1167 (CHC-2018-476-HCM).[3,4] The main entrance to the Primary Studio Complex includes a distinctive bridge over an area of lower grade, covered by a canopy featuring the "Television City" sign at the bridge entrance facing north. The Primary Studio Complex was constructed as the first phase of the Pereira & Luckman master plan, which called for the eventual development of 2.5 million square feet with multi-story office towers up to 12 stories in height fronting Beverly Boulevard and Fairfax Avenue, a long retail block along Beverly Boulevard, and 24 stages. This full expansion under the Pereira & Luckman master plan was never realized, and the original four sound stages within the Primary Studio Complex have undergone additions, exterior alterations, and ongoing reconfiguration of interior spaces, reflecting the original design intent for flexibility as production demands evolved over time.

Following the development of the Primary Studio Complex in 1952, substantial expansions of on-site development occurred in and around 1969 and 1976 to allow for more stage, production support, and production office space. The Service Building was

[3] The Primary Studio Complex was formally designated as HCM No. 1167 by the City Council on June 26, 2018.

[4] Please refer to Section IV.B, Cultural Resources, of this Draft EIR for a detailed discussion of the Primary Studio Complex.

extended to the east with additions in 1969, and the Support Building was added to the west elevation of the Studio Building in 1976. Other alterations to the Primary Studio Complex over subsequent decades have involved several additions to the roofs and ongoing changes in the use of interior spaces, such as the construction of additional production office space, conversion of the original rehearsal halls into stage space, a remodel of the primary entry lobby, addition of a commissary, and other conversions of interior and exterior spaces to meet production needs such as basecamp and audience experience uses.

Beyond the Primary Studio Complex, numerous ad hoc additions and modifications have been made to the Project Site to accommodate the evolving needs of studio operations and the increasing demand for production space. A myriad of production office and support buildings, basecamp trailers, and bungalows were constructed to meet day-to-day production needs and create a modernized studio campus. In 1993, the three-story, detached East Studio Building was completed, which contained stage, production support, and production office uses. In addition, the original lawn and lower landscaped terrace along Beverly Boulevard were removed and replaced to accommodate parking, basecamp, and circulation needs. Further, the Project Site today includes photovoltaic canopies within the surface parking lots along Beverly Boulevard and Fairfax Avenue and perimeter security fencing with visual screening to meet safety and privacy needs.

Existing studio parking is provided in surface lots that are located primarily along the perimeter of the Project Site. The current parking supply is approximately 1,510 spaces. Access to the Project Site is provided at multiple points around the perimeter, including the following: (1) three driveways and one pedestrian gate along Beverly Boulevard;[5] (2) two driveways and one pedestrian gate along Fairfax Avenue; (3) a pedestrian gate along The Grove Drive; and (4) one pedestrian gate along the southern boundary of the Project Site. All vehicular and pedestrian entrances and exits include internal controlled access, and a series of drive aisles and sidewalks provide access throughout the Project Site.

The Project Site perimeter is enclosed with chain link, wrought iron, and/or combination block wall/chain link fencing, much of which is lined with trees, shrubs, bougainvillea and climbing vines, and segments of which include green screening. Additional landscaping within the Project Site interior includes limited trees, succulents and shrubs, and some of the parking areas include landscaped infiltration basins. Street trees are also located along Beverly Boulevard and Fairfax Avenue. Public views of the Project Site and the Primary Studio Complex are limited due to the perimeter security fencing and landscaping, and the existing carports with solar panels that cover the surface parking areas along the western and much of the northern portions of the Project Site, which

[5] Two of the Beverly Boulevard driveways are existing curb cuts that are not currently used for access.

obscure views from Fairfax Avenue and Beverly Boulevard, respectively. Additionally, while the public sidewalks around the Project Site perimeter range from 9 to 15 feet wide, the areas accessible to pedestrians are as narrow as three to four feet along portions of The Grove Drive and Fairfax Avenue. Further, the sidewalk widths along The Grove Drive and Fairfax Avenue do not meet current City standards.

In terms of topography, the Project Site slopes gently down from northeast to southwest. The existing Project Site elevations range from approximately 185 to 201 feet above mean sea level (AMSL). The Primary Studio Complex, where the main production facilities are located, is at an elevation of 201 feet AMSL, which is referred to herein as Project Grade.[6]

6. Description of the Proposed Project

The Project would involve the continuation of an existing studio use and the modernization and expansion of Television City to meet the contemporary needs and changing demands of the entertainment industry, while rehabilitating and preserving the integrity of the HCM. Since a comprehensive set of standards to guide Television City's development and growth does not currently exist, the Project Applicant proposes a Specific Plan, which would establish a clear and cohesive development framework for the entire Project Site, serving to integrate the proposed mix of permitted land uses and set standards for Project Site planning, massing, and building design. The Specific Plan would allow for the construction of up to 1,626,180 square feet of new sound stages, production support, production office, general office, and retail uses. Buildout under the Specific Plan could take place in one phase over a 32-month period or could occur in phases over multiple years. Accordingly, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043.

Under the Specific Plan, portions of the Project Site would be redeveloped with new studio-related uses, circulation improvements, parking facilities, landscaping, and open space. The Specific Plan would establish development guidelines and standards to regulate basic planning, design, and development concepts for future development within Television City. These development guidelines and standards would provide a measure against which specific future development proposals could be evaluated. As such, the proposed Specific Plan would create a regulatory framework that accounts for the special needs of the Project Site and provides the Applicant with flexibility to address potential future changes in technology and space requirements inherent to the rapid pace of entertainment technology's advancement. The primary development regulations set forth

[6] Project Grade is established at an elevation of 201 feet AMSL, which represents the base level of production activity and a substantial portion of the existing topographic elevation of the Project Site.

in the Specific Plan would address land use, design, historic preservation, childcare, alcohol sales, and parking, as well as associated implementation procedures. In addition, a Sign District would be established to permit Project related on-site signs.

At full buildout, the Specific Plan would permit a total of up to a maximum of 1,874,000 square feet of floor area within the Project Site, as detailed in Section II, Project Description, of this Draft EIR, for a sitewide floor area ratio (FAR) of 1.75:1. As also shown in Section II, Project Description, of this Draft EIR, the Specific Plan would allow for the construction of approximately 1,626,180 square feet of new sound stage, production support, production office, general office, and retail uses; the demolition of up to 495,860 square feet of existing uses; and the retention of up to 247,820 square feet of existing uses. The specific mix of uses ultimately constructed will depend upon market demands, and the Specific Plan would allow flexibility in locating the various uses within the Project Site. The Specific Plan would also allow for the exchange of certain permitted land uses through a land use exchange procedure, as described in Section II, Project Description, of this Draft EIR. A conceptual site plan is also provided in Section II, Project Description, of this Draft EIR, and illustrates one possible development scenario that could be developed in conformance with the proposed Specific Plan. Actual development would be governed by the requirements of the proposed Specific Plan and not the conceptual site plan, which is intended to provide an illustrative depiction of future Project Site development. The Specific Plan is intended to allow Television City to adapt and evolve over time in a manner that honors and realizes the legacy of the original Pereira & Luckman master plan, rehabilitates and preserves the integrity of the HCM, and achieves the Project objectives.

As part of the Specific Plan, height zones with specified height limits would be established to regulate building heights throughout the Project Site. Much of the Project Site would be subject to a base height limit of 88 feet as measured from Project Grade (i.e., 201 feet AMSL), consistent with the height of the existing HCM on-site. This base height limit would be augmented with maximum height limits in limited portions of certain height zones, as shown in Figure II-5 of Section II, Project Description, of this Draft EIR.

The Project would preserve the integrity of the existing HCM, and any new construction within the Project Site would be required to comply with the applicable provisions of the Specific Plan, including historic preservation regulations. The Project would preserve all of the existing historic character-defining features of the Primary Studio Complex and restore those character-defining features which, in some cases, have been compromised in the past (prior to this Project), consistent with the HCM designation. The Specific Plan would provide guidelines and parameters for new construction to ensure that the Project will preserve the integrity of the HCM and its historic character-defining features. The Project Applicant would prepare a Historic Structure Report (HSR) to further document the history of the Primary Studio Complex and guide its rehabilitation in compliance with the Secretary of the Interior's Standards for Rehabilitation (Rehabilitation

Standards). The Project would comply with Section 22.171.14 of the City's Cultural Heritage Ordinance with oversight by the City of Los Angeles Office of Historic Resources (OHR), thus ensuring compliance with the Rehabilitation Standards. In addition, all new construction located within the area along Beverly Boulevard beginning at Genesee Avenue and extending approximately 430 linear feet west would require review by the Director of City Planning.

Project buildout may occur in one phase, with a total construction period of approximately 32 months. Construction could begin as soon as 2023 and end as soon as 2026. However, the Project Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043. In accordance with Los Angeles Municipal Code (LAMC) requirements, construction activities generally would be permitted to occur Monday through Friday from 7:00 A.M. to 9:00 P.M. and between 8:00 A.M. and 6:00 P.M. on Saturday or national holidays, or outside of these hours if a temporary noise variance is approved by the Los Angeles Board of Police Commissioners. Earthwork activities would require an estimated 772,000 cubic yards of cut, potentially 50,000 cubic yards of imported fill, and up to 772,000 cubic yards of export, with a maximum excavation depth of approximately 45 feet.

Refer to Section II, Project Description, of this Draft EIR for a detailed description of the Project, including the requested permits and approvals.

7. Areas of Controversy

Based on the NOP comment letters provided in Appendix A of this Draft EIR, issues known to be of concern include, but are not limited to, Project impacts associated with construction activities, air quality, historical resources, transportation, and the pedestrian experience. Refer to Appendix A of this Draft EIR for copies of the NOP comment letters. Potential areas of controversy and issues of concern may also include those environmental issue areas where the potential for a significant and unavoidable impact has been identified. As discussed below, these areas include regional construction-related emissions of nitrogen oxides (NO_X); on- and off-site noise during construction; and on- and off-site vibration during construction (based on the significance threshold for human annoyance). Cumulative impacts associated with regional construction-related NO_X emissions, on- and off-site noise during construction, and off-site vibration during construction (based on the significance threshold for human annoyance) would also be significant and unavoidable. In addition, both Project-level and cumulative impacts associated with emissions of NOx and volatile organic compounds (VOC) would be significant and unavoidable under a long-term buildout scenario due to concurrent construction and operations.

8. Public Review Process

The City prepared an Initial Study and circulated an NOP for public comment to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties on July 2, 2021, for a 30-day review period. In addition, a public scoping meeting for the Project was held on July 20, 2021. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft EIR.

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

9. Summary of Environmental Impacts

Table I-1 on page I-14 provides a summary of the environmental impacts of the Project evaluated in this Draft EIR. Based on the analysis in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant impacts that cannot be feasibly mitigated impacts with respect to regional construction-related emissions of NO_X; on- and off-site noise during construction; and on- and off-site vibration during construction (based on the significance threshold for human annoyance). Cumulative impacts associated with regional construction-related NO_X emissions, on- and off-site noise during construction, and off-site vibration during construction (based on the significance threshold for human annoyance) would also be significant and unavoidable. In addition, both Project-level and cumulative impacts associated with emissions of NOx and VOC would be significant and unavoidable under a long-term buildout scenario due to concurrent construction and operations.

Table I-1
Summary of Impacts Under the Project

Environmental Issue	Project Impact
A. AIR QUALITY	
Construction	
Regional Emissions	**Significant and Unavoidable**[a]
Localized Emissions	Less Than Significant w/ Mitigation
Toxic Air Contaminants	Less Than Significant
Operation	
Regional Emissions	Less Than Significant
Localized Emissions	Less Than Significant
Toxic Air Contaminants	Less Than Significant
Concurrent Construction and Operation	**Significant and Unavoidable**[b]
B. CULTURAL RESOURCES	
Historical Resources	Less Than Significant
Archaeological Resources	Less Than Significant w/ Mitigation
C. ENERGY	
Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources	
Construction	Less Than Significant
Operation	Less Than Significant
Conflict with Plans for Renewable Energy or Energy Efficiency	Less Than Significant
D. GEOLOGY AND SOILS	
Geologic Hazards	Less Than Significant
Paleontological Resources	Less Than Significant w/ Mitigation
E. GREENHOUSE GAS EMISSIONS	Less Than Significant
F. HAZARDS AND HAZARDOUS MATERIALS	
Construction	Less Than Significant w/ Mitigation
Operation	Less Than Significant
G. HYDROLOGY AND WATER QUALITY	
Surface Water Hydrology	
Construction	Less Than Significant
Operation	Less Than Significant
Surface Water Quality	
Construction	Less Than Significant
Operation	Less Than Significant
Groundwater Hydrology	
Construction	Less Than Significant
Operation	Less Than Significant

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

Environmental Issue	Project Impact
Groundwater Quality	
Construction	Less Than Significant
Operation	Less Than Significant
H. LAND USE AND PLANNING	Less Than Significant
I. NOISE	
Construction	
On-Site Noise	**Significant and Unavoidable**[a]
Off-Site Noise	**Significant and Unavoidable**[a]
On-Site Vibration (Building Damage)	Less Than Significant
On-Site Vibration (Human Annoyance)	**Significant and Unavoidable**
Off-Site Vibration (Building Damage)	Less Than Significant
Off-Site Vibration (Human Annoyance)	**Significant and Unavoidable**[a]
Operation	
On-Site Noise	Less Than Significant
Off-Site Noise	Less Than Significant
Vibration	Less Than Significant
J. PUBLIC SERVICES	
Fire Protection	
Construction	Less Than Significant
Operation	Less Than Significant
Police Protection	
Construction	Less Than Significant
Operation	Less Than Significant
K. TRANSPORTATION	
Conflict with Plans	Less Than Significant
Vehicle Miles Traveled	Less Than Significant
Freeway Safety Analysis	Less Than Significant
L. TRIBAL CULTURAL RESOURCES	Less Than Significant
M. UTILITIES AND SERVICE SYSTEMS	
Water Supply and Infrastructure	
Construction	Less Than Significant
Operation	Less Than Significant
Wastewater	
Construction	Less Than Significant
Operation	Less Than Significant
Electric Power, Natural Gas, and Telecommunications Infrastructure	
Construction	Less Than Significant
Operation	Less Than Significant

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

Environmental Issue	Project Impact

[a] *Both Project-level and cumulative impacts would be significant and unavoidable.*

[b] *While Project buildout is anticipated in 2026, the Project Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043. This impact would only occur in the event of concurrent construction and operation associated with long-term buildout.*

Source: Eyestone Environmental, 2022.

10. Project Design Features

The following Project design features would be implemented as part of the Project:

a. Air Quality

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

b. Cultural Resources

Project Design Feature CUL-PDF-1: Project Parameters—The following Project Parameters set forth the maximum permitted development footprint and building heights for new adjacent construction and additions to the Primary Studio Complex to ensure that the historic significance of the Primary Studio Complex is not adversely impacted by new construction. These Project Parameters will not limit the land uses or floor areas permitted under the proposed Specific Plan. Conceptual diagrams illustrating the Project Parameters set forth below are included in Section 9 of the Historical Resources Technical Report—TVC 2050 Project (Historic Report), provided in Appendix C of the Draft EIR.

Rehabilitation of the Primary Studio Complex and new construction adjacent to the Primary Studio Complex will comply with the following Project Parameters:

Rehabilitation of the Primary Studio Complex

- Preserve the existing character-defining features of the Primary Studio Complex, as detailed in designated Historic-Cultural Monument (HCM) No. 1167 (CHC-2018-476-HCM), and restore

those character-defining features which, in some cases, have been compromised in the past (prior to this Project).[7]

- Remove the non-historic Support Building addition on the west side of the Studio Building, thereby restoring the original volume of the Studio Building, revealing the currently obstructed portions of the Studio Building's original west wall and restoring areas that have previously been removed.
- Remove up to two bays of the Studio Building's west wall to allow for an interior east-west passage through the Primary Studio Complex.
- Remove the non-historic Mill Addition constructed in 1969 on the east side of the Service Building.
- Retain and rehabilitate the three-story office portion of the Service Building and its steel frame and glass curtain walls on the primary (north) and east façades.
- Remove the portion of the Service Building south of the three-story office, much of which has been altered since 1963.
- Replace the portion of the Service Building south of the three-story office with new construction that partially restores the original volume of the Service Building.
- Remove and/or extend the south façade of the Studio Building by up to 20 feet south.
- Remove portions of the roof of the Studio Building above the interior east-west passage to create a partial open-air corridor.

Rooftop Addition above the Primary Studio Complex

- Design any rooftop addition as a single rectangular volume.
- Design any rooftop addition to be a separate and distinct volume rather than as an integrated extension of the Primary Studio Complex.
- Limit the height of any rooftop addition to 36 feet in height when measured from the top of the parapet of the Studio Building (approximately 84 feet above Project Grade) to the roof of the rooftop addition.
- Set back any rooftop addition a minimum of 55 feet from the north façade of the Studio Building.

[7] The character-defining features of the Primary Studio Complex are set forth in the findings that were adopted as part of the HCM designation (CHC-2018-476-HCM), which is included in Appendix C of the Historic Report.

- Engineer the structural support of any rooftop addition so that it could be removed without impairing the essential form and integrity of the Primary Studio Complex.

Adjacent New Buildings

- Locate new buildings immediately adjacent to the Primary Studio Complex to the east and south of the Service Building and to the west of the Studio Building.
- For any new construction immediately east of the Service Building that exceeds the height of the Service Building, any occupiable structure will be set back southerly from the north façade of the Service Building by a minimum of 60 feet and separated from the east façade of the Service Building by a minimum of 15 feet.
- For any new construction immediately west of the Studio Building that exceeds the height of the Service Building, any occupiable structure will be set back southerly from the north façade of the Service Building by a minimum of 150 feet and separated from the west façade of the Studio Building by a minimum of 10 feet.
- Limit new construction on the west and east of the Primary Studio Complex to 225 feet in height above Project Grade.
- Design new construction to the west and east of the Primary Studio Complex as distinct volumes.
- Permit up to six open-air bridges at the interior floor levels (three on the east and three on the west) to provide pedestrian access to the Primary Studio Complex and any rooftop addition from the adjacent new buildings.

Project Design Feature CUL-PDF-2: Historic Structure Report—The Applicant will prepare a Historic Structure Report (HSR) that will further document the history of the Primary Studio Complex and guide its rehabilitation in compliance with the Secretary of the Interior's Standards for Rehabilitation (Rehabilitation Standards). The HSR will be completed prior to the development of the architectural and engineering plans for the Project. The HSR will be prepared based upon the National Park Service's Preservation Brief #43: The Preparation and Use of Historic Structure Reports. The HSR will thoroughly document and evaluate the existing conditions of the character-defining features of the Primary Studio Complex and make recommendations for their treatment. The HSR will also address changes to the buildings to suit new production techniques and modern amenities as well as their on-going maintenance after Project completion. The HSR will set forth the most appropriate approach to treatment and outline a scope of recommended work before the commencement of any construction. As such, the report will serve as an important guide for the rehabilitation of the Primary Studio Complex

and will provide detailed information and instruction above and beyond what is typically available prior to the rehabilitation of a historical resource.

c. Geology and Soils

Project Design Feature GEO-PDF-1: All development activities conducted on the Project Site will incorporate the professional recommendations contained in the Preliminary Geotechnical Engineering Investigation and all associated Addenda and/or alternative recommendations set forth in a site-specific, design-level geologic and geotechnical investigation(s) approved by the City Engineer, provided such recommendations meet and/or surpass relevant state and City laws, ordinances, and Code requirements, including California Geological Survey's Special Publication 117A and the City's Building Code. Such professional recommendations will include, but will not be limited to, the following and may be revised or superseded in accordance with an approved final geotechnical investigation(s):

- Excavated fill materials will be removed and exported or properly removed and recompacted as controlled fill for foundation and/or slab support of lightly loaded structures.
- Imported soil materials will have an Expansion Index of less than 50.
- At-grade structures with column loads less than 500 kips will be supported on conventional foundations bearing in an engineered fill pad.
- Foundation piles will be used for high-load office buildings and parking structures.
- Temporary dewatering will be utilized during construction.
- Permanent structures will be designed for hydrostatic pressure such that the temporary construction dewatering system will be terminated at the completion of construction.
- Temporary shoring, such as conventional shoring piles and tiebacks, will be installed for excavation of the subterranean levels**.**

d. Greenhouse Gas Emissions

Project Design Feature GHG-PDF-1: The design of new buildings will incorporate features of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) program to be capable of meeting the standards of LEED Gold under LEED v4 or equivalent green building standards. Specific sustainability features that are integrated

into the Project design will include, but will not be limited to, the following:

a. Incorporate energy-saving technologies and components to reduce the Project's electrical use profile. Examples of these components include the use of light-emitting diode (LED) and other efficient lighting technology, energy saving lighting control systems, such as light- and motion-detection controls (where applicable), and energy efficient heating, ventilation, and air conditioning (HVAC) equipment;

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

c. Reduce indoor water use by at least 20 percent;

d. Plumbing fixtures (water closets and urinals) and fittings (faucets) that exceed Los Angeles Municipal Code (LAMC) performance requirements; and

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

Project Design Feature GHG-PDF-2: Upon buildout of the Project, the Project will provide photovoltaic panels on the Project Site capable of generating a minimum of 2,000,000 kilowatt-hours annually.

e. Hazards and Hazardous Materials

Project Design Feature HAZ-PDF-1: The Project Applicant will update, and the Project will comply with, the Consolidated Contingency Plan for the Project Site. This will include spill prevention measures such the use of secondary containment storage and storing materials away from drains in leak-proof containers with tight-fitting lids. Spill response measures will include the evacuation of unnecessary employees from a spill area, the use of absorbent materials in the case of small spills or evacuating all employees, calling 911, and reporting to Los Angeles Fire Department (LAFD) in the case of large spills. Absorbent materials used to clean small spills will be placed in a leak-proof container that is compatible with the waste, labeled as hazardous waste, and lawfully disposed of as such. Notifications will be made to the Health Hazardous Waste Materials Division of the LAFD and the California Office of Emergency Services (Cal OES) as necessary.

Project Design Feature HAZ-PDF-2: The Project Applicant will update, and the Project will comply with, the Television Studios Emergency Action Plan and associated emergency exit and assembly maps. The Emergency

Action Plan will include procedures for earthquakes, emergency evacuation, fires, medical emergencies, and active shooters.

Project Design Feature HAZ-PDF-3: The Project Applicant will update, and the Project will comply with, the Television Studios Safety Manual. This manual will include, among other measures, safety procedures and requirements for personnel working at heights and procedures that ensure the safety of crew members when servicing or repairing equipment that is capable of a spontaneous release of stored mechanical, electrical, or hydraulic energy, or which could be inadvertently energized.

Project Design Feature HAZ-PDF-4: The Project Applicant will update, and the Project will comply with, the Television Studios Injury and Illness Prevention Program (IIPP). The IIPP will include protocols regarding responsibility, compliance, employee communication, hazard assessment, accident/exposure investigation, hazard correction, training and construction, and recordkeeping.

Project Design Feature HAZ-PDF-5: Prior to demolition, existing buildings and structures will be tested to determine if they include asbestos-containing materials (ACMs). If present, ACMs will be removed and disposed of by a licensed and certified asbestos abatement contractor, in accordance with applicable federal, state, and local regulations. If required, the Project Applicant will submit a Hazardous Building Materials Demolition Assessment and Management Plan to the South Coast Air Quality Management District (SCAQMD) and LAFD for review and approval.

Project Design Feature HAZ-PDF-6: Prior to demolition, existing buildings and structures will be sampled to determine if they contain lead-based paint (LBP). If LBP is present, standard handling and disposal practices will be implemented pursuant to Occupational Safety and Health Act regulations. If required, the Project Applicant will submit a Hazardous Building Materials Demolition Assessment and Management Plan to LAFD for review and approval.

f. Noise

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

Project Design Feature NOI-PDF-2: Project construction will not include the use of driven (impact) pile systems.

Project Design Feature NOI-PDF-3: Outdoor mounted mechanical equipment will be enclosed or screened by the building design (e.g., a roof parapet or mechanical screen) from the view of off-site noise-sensitive receptors.

Project Design Feature NOI-PDF-4: Outdoor amplified sound systems for outdoor gatherings (non-production uses) on roof decks, if any, will be designed so as not to exceed a maximum noise level of 85 A-weighted decibels (dBA) (L_{eq-1hr}) at a distance of 25 feet from the amplified speaker sound systems in any roof deck gathering areas located within 15 feet from the northern, southern and western property lines and within 40 feet from the eastern property line, and 95 dBA (L_{eq-1hr}) at a distance of 25 feet from the amplified speaker sound systems within the interior portions of the Project Site.[8] A qualified noise consultant will provide written documentation that the design of the system complies with these maximum noise levels.

Project Design Feature NOI-PDF-5: Outdoor studio production activities will be prohibited within 200 feet of the Shared Eastern Property Line adjacent to the existing multi-family residence located immediately east of the Project Site (receptor location R1) between the hours of 10 P.M. and 7 A.M.

g. Police Protection

Project Design Feature POL-PDF-1: During Project construction, the Applicant will implement security measures including security fencing, low-level security lighting, locked entry, and security patrols.

Project Design Feature POL-PDF-2: During operation, the Project will incorporate a 24/7 security plan to ensure the safety of its employees and visitors. The Project's security plan will include, but will not be limited to, the following design features:

- Security fencing, walls, landscaping, and/or other elements to create a physical barrier at the Project Site perimeter;
- Points of entry will be secured by elements such as guard booths, key card passes, and pedestrian and vehicular access controls;
- A 24-hour security camera network to provide visual surveillance of outdoor areas, parking facilities, and other activity areas;
- Private on-site security staff, including at guard booths to control entry, and regular security patrols of the Project Site; and

[8] Based on the conceptual site plan shown in Section II, Project Description, of this Draft EIR, the potential roof decks along the perimeter were assumed to be at least 75 feet above adjacent grade and the roof decks within the interior portion of the Project Site were assumed to be at least 50 feet above grade.

- Appropriate staff training on security protocols, including site and building access control, managing and monitoring fire/life/safety systems, and patrolling the Project Site.

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

Project Design Feature POL-PDF-4: The Project will include appropriate lighting of parking areas, elevators, and lobbies to maximize visibility and reduce areas of concealment.

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

Project Design Feature POL-PDF-6: Prior to the issuance of a building permit, the Applicant will consult with Los Angeles Police Department's (LAPD's) Crime Prevention Unit regarding the incorporation of feasible crime prevention features appropriate for the design of the Project.

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

h. Transportation

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

- The Project Applicant will designate a construction manager to serve as a liaison with the surrounding community and respond to any construction-related inquiries. Publicly visible signs will be posted at various locations with the liaison's contact information to contact regarding dust complaints. The South Coast Air Quality Management District's phone number will also be included to ensure compliance with applicable regulations.

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent streets or in predominantly residentially zoned areas.
- Temporary pedestrian, bicycle, and vehicular traffic controls (e.g., flag people trained in pedestrian and bicycle safety at the Project Site's driveways) during all construction activities adjacent to Fairfax Avenue, Beverly Boulevard, and The Grove Drive, to ensure traffic safety on the public right-of-way.
- Scheduling of construction-related activities to reduce the effect on traffic flow on surrounding major roadways.
- Containment of construction activity within the Project Site boundaries, to the extent feasible.
- Coordination with the Los Angeles Department of Transportation (LADOT) Parking Meter Division to address any potential loss of metered parking spaces.
- Implementing safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers.
- Rerouting construction trucks to reduce travel on congested streets.
- Provision of dedicated turn lanes for the movement of construction trucks and equipment on- and off-site, subject to LADOT approval.
- Prohibition of haul truck staging on any streets adjacent to the Project Site, unless specifically approved as a condition of an approved haul route.
- Spacing of trucks so as to discourage a convoy effect.
- Sufficient dampening of the construction area to control dust caused by grading and hauling and reasonable control at all times of dust caused by wind.
- Maintenance of a log, available on the Project Site at all times, documenting the dates of hauling and the number of trips (i.e., trucks) per day.
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities and posting of the telephone number at the Project Site readily visible to any interested party during site preparation, grading, and construction.
- Obtaining the required permits for truck haul routes from the City prior to the issuance of any building permit for the Project.

Project Design Feature TR-PDF-2: The Project will implement a series of transportation demand management (TDM) measures that exceed the requirements established in the current TDM Ordinance. The TDM strategies will be implemented for the Project Site as a whole and will be available to both the existing and new employees on-site. The TDM Program will be subject to review and approval by the City, and the Project Applicant will record a Covenant and Agreement to ensure that the TDM Program will be maintained. The following TDM strategies will be implemented as proposed under the TDM Program:

- Educational Programs/On-Site Coordinator: A coordinator will reach out to employees directly to promote the benefits of TDM. The coordinator will provide information on public transit and any related incentives, flexible work schedules and telecommuting programs, pedestrian and bicycle amenities, rideshare/carpool/ vanpool programs, and parking incentives. Marketing activities, including printed/posted materials and digitally distributed information, will ensure that employees and visitors at the Project Site are aware of the benefits of the TDM Program and all of the mobility options available on-site and in the surrounding area.
- Transportation Information Center/Kiosks via Mobility Hub: The Project will install a transportation information center at a Mobility Hub. The transportation information center will provide employees and visitors with information regarding transit, commute programs, and non-vehicular travel planning. Informational digital bulletin boards and wayfinding information will be displayed along pedestrian paths to direct pedestrians to the Mobility Hub, nearby transit stops, bicycle parking, and bikeshare facilities.
- Bicycle Parking and Amenities: In order to facilitate bicycle use, the Project will provide short-term and long-term bicycle parking spaces in accordance with the Los Angeles Municipal Code (LAMC), as well as valet service, showers, lockers, and bicycle service areas and repair stands within the Project Site. The Project will incorporate features for bicyclists, such as exclusive access points and secured bicycle parking facilities. The Project Applicant will also contribute toward the implementation of bicycle improvements within the Study Area in accordance with the Mobility Plan.
- Pedestrian Amenities: The Project will incorporate features for pedestrians, such as landscape improvements, exclusive access points, and upgraded pedestrian facilities and bus stops. Additionally, the Project Site will be designed to be a safe, friendly, and convenient environment for pedestrians. The Project will provide more pedestrian-friendly sidewalks and areas along Fairfax Avenue, Beverly Boulevard, and The Grove Drive and maintain

internal walkways throughout the Project Site. The Project Applicant will also contribute toward pedestrian facilities improvements as part of Vision Zero.

- Shuttle Service: The Applicant will either operate or fund an employee van or shuttle service between the proposed Metro D (Purple) Line Wilshire/Fairfax Station and the Project Site. The shuttle will operate during typical commuter peak periods and provide service from or near the Project Site to the Metro D Line Wilshire/Fairfax Station. The shuttle service will enhance employee access to the Metro D Line and, therefore, result in greater reductions in vehicle trips and vehicle miles traveled (VMT). Additionally, the Mobility Hub could support future shuttle services to connect to existing and future transit stations (e.g., the Metro B Line or Crenshaw North Extension).
- Ride-Share Matching and Carpool/Vanpool Program: The on-site TDM coordinator will provide ride-share matching services to match interested employees with similar commuters into carpools and vanpools.
- Neighborhood Enhancements: The Project will enhance the transportation mobility around the immediate Project Site area to encourage alternative transportation modes and connections to the Project Site from off-site locations. The Project will also enhance the existing crosswalks at the signalized intersections along Beverly Boulevard at Fairfax Avenue and Stanley Avenue/The Grove Drive to current LADOT standards with new continental crosswalks and black and white contrast markings.[9]
- First-Mile/Last-Mile Options: In recent years, there has been a proliferation of new options for personal transportation that help to address first-mile/last-mile connectivity issues with public transit. These options include motorized scooters, skateboards, and bicycles, as well as human-powered bicycles. Some of these options involve personal ownership (various types of electric skateboards, bicycles, and scooters) and some are publicly available for short-term rentals (electric scooters, Metro Bike Share pedal-powered bicycles). These services are rapidly evolving and gaining widespread acceptance, and it is anticipated that by the time the Project is completed, the landscape for these services, as well as the regulatory issues surrounding some of them, may look substantially different. The Applicant is committed to forward-

[9] While LADOT recommended in their Assessment Letter for the Transportation Assessment to improve the visibility of crosswalks, all crosswalks adjacent to the Project Site have since been improved with continental crosswalks.

thinking in the design and implementation of the Project and will provide support for such services at the Mobility Hub, as appropriate. Specifically, as required by LADOT, the Mobility Hub will include space to accommodate support uses, storage, maintenance, and staging facilities. These services will give employees and visitors a variety of travel mode choices and, therefore, encourage the use of non-automobile modes to and from the Project Site and reduce VMT.

- Carpool/Vanpool Parking and Loading via Mobility Hub: The Mobility Hub will provide safe and convenient passenger loading areas for employee carpools/vanpools along with access to the Project Site's internal roadway network to get to the parking structures. Additional passenger loading areas are also proposed on Fairfax Avenue, Beverly Boulevard, and the Southern Shared Access Drive for carpools, vanpools, shuttles, ride-share, taxi, and other commercial and non-commercial vehicles.
- Guaranteed Ride Home Program: A Guaranteed Ride Home program assures that transportation service will be provided to individuals who commute without their personal automobiles. This program overcomes one of the primary concerns of those who may choose alternative modes of transportation, which is how to get home or to a child's school in the case of an emergency. In the event of personal or family emergencies, the individual will be reimbursed for a taxi ride, ride-share ride, or short-term car rental. This program will cover all employees participating in the carpool/vanpool program or using transit to and from the Project Site. A support service, such as Guaranteed Ride Home, is an important part of TDM implementation that assures an individual will not be dependent on a carpool or transit schedule in the event of an emergency.
- Transit Infrastructure Improvements: The Project will improve the existing transit infrastructure at bus stops located within the immediate vicinity of the Project Site along Fairfax Avenue and Beverly Boulevard. This will include, where applicable, upgrades to provide adequate benches, shelters, lighting, light-emitting diode (LED) displays, and signage.

Project Design Feature TR-PDF-3: The Project will include the following off-site Vision Zero safety improvements:[10]

[10] While LADOT recommended in their Assessment Letter for the Transportation Assessment to improve the visibility of crosswalks, all crosswalks adjacent to the Project Site have since been improved with continental crosswalks.

- Where applicable, the Project will improve the existing pedestrian infrastructure at the bus stops located around the Project Site perimeter along Fairfax Avenue and Beverly Boulevard to include adequate benches, shelters, lighting, LED displays, and signage to the extent feasible under the City of Los Angeles' current bus shelter contract.
- The Project Applicant will contribute toward the funding of pedestrian facilities and safety improvements within the Study Area, including a pedestrian hybrid beacon at Stanley Avenue and Melrose Avenue.

Project Design Feature TR-PDF-4: The Project Applicant will contribute up to $1.34 million toward transportation systems management (TSM) improvements within the Project area that may be considered to better accommodate intersection operations and increase network capacity throughout the Study Area. LADOT's Automated Traffic Surveillance and Control (ATSAC) Section has identified the following improvements within the Project area along Fairfax Avenue, Beverly Boulevard, and The Grove Drive:

- Fairfax Avenue and Beverly Boulevard—Signal upgrades, 351 cabinet with new signal controller, system loop, flashing yellow arrow at Beverly Boulevard for the westbound left-turn.
- Fairfax Avenue and Oakwood Avenue—Northbound and southbound system loops.
- Fairfax Ave and 3rd Street—Signal upgrades, new cabinet, flashing yellow arrow for eastbound and westbound left turn.
- The Grove Drive and 3rd Street—New signal controller for leading pedestrian interval.
- The Grove Drive and Beverly Boulevard—Closed Circuit TV (CCTV) camera, new cabinet and signal controller for leading pedestrian interval.
- The Grove Drive Corridor—Signal communication including conduit, 25 pair interconnect, 24SM single mode fiber, pull boxes, and ground cables.
- Beverly Boulevard and Genesee Avenue—System loops for eastbound and westbound, and new cabinet and westbound left-turn phasing (if warranted).
- Beverly Boulevard and Gardner Street—System loops for eastbound and westbound.
- Beverly Boulevard and Curson Avenue—System loops for eastbound and westbound.

Project Design Feature TR-PDF-5: The Project will install left-turn signal phases at the following three key intersections: Fairfax Avenue and 3rd Street, Martel Avenue/Hauser Boulevard and 3rd Street, and La Brea Avenue and 3rd Street.

i. Utilities and Service Systems—Water Supply and Infrastructure

Project Design Feature WAT-PDF-1: In addition to any existing applicable regulatory requirements, the Project design will incorporate the following water conservation features to support water conservation:

- High-Efficiency Toilets with a flush volume of 1.1 gallons per flush or less.
- Showerheads with a flow rate of 1.5 gallons per minute or less.
- ENERGY STAR Certified Residential Dishwashers—standard with 3.0 gallons/cycle or less.
- Drip/Subsurface Irrigation (Micro-Irrigation).
- Proper Hydro-Zoning/Zoned Irrigation (groups plants with similar water requirements together).

11. Mitigation Measures

The following mitigation measures would be implemented as part of the Project:

a. Air Quality

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

list described above shall meet the United States Environmental Protection Agency (USEPA) Tier 4 Final standards.

Mitigation Measure AIR-MM-2: The Project's truck operator(s)/construction contractor(s) shall commit to using 2010 model year or newer engines that meet CARB's 2010 engine emission standards of 0.01 g/brake horsepower (bhp)-hr for particulate matter and 0.20 g/bhp-hr of nitrogen oxide emissions or newer, cleaner trucks for haul trucks associated with demolition and grading/excavation activities and concrete delivery trucks during concrete mat foundation pours. To monitor and ensure 2010 model year or newer trucks are used during Project construction, the Lead Agency shall require that truck operator(s)/construction contractor(s) maintain records of trucks during the applicable construction activities and make these records available to the Lead Agency during the construction process upon request.

Mitigation Measure AIR-MM-3: Construction staging areas shall be located as far away as feasible from adjacent residential uses.

Mitigation Measure AIR-MM-4: All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.

b. Cultural Resources

Mitigation Measure CUL-MM-1: Prior to the start of ground disturbance activities during Project construction, including demolition, digging, trenching, plowing, drilling, tunneling, grading, leveling, removing peat, clearing, augering, stripping topsoil or a similar activity (Ground Disturbance Activities), a qualified principal archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology shall be retained to prepare a written Cultural Resource Monitoring and Treatment Plan in accordance with the Secretary of the Interior's Standards for Archaeological Documentation, to reduce potential Project impacts on unanticipated archaeological resources unearthed during construction, with an emphasis on potential historical-period materials. The Cultural Resource Monitoring and Treatment Plan shall include the professional qualifications required of key staff, monitoring protocols relative to the varying archaeological sensitivity across the Project Site, provisions for evaluating and treating unanticipated cultural materials discovered during ground-disturbing activities, situations under which monitoring may be reduced or discontinued, and reporting requirements.

Prior to commencing any Ground Disturbance Activities at the Project Site, the Applicant shall retain an archaeological monitor(s) who are

qualified to identify archaeological resources and who shall be approved by the Office of Historic Resources (OHR).

Prior to the commencement of any Ground Disturbance Activities, the archaeological monitor(s) shall provide Worker Environmental Awareness Program (WEAP) training to construction workers involved in Ground Disturbance Activities that provides information on regulatory requirements for the protection of cultural resources. As part of the WEAP training, construction workers shall be informed about proper procedures to follow should a worker discover a cultural resource during Ground Disturbance Activities. In addition, construction workers shall be shown examples of the types of resources that would require notification of the archaeological monitor. The Applicant shall maintain on the Project Site, for City inspection, documentation establishing that the training was completed for all construction workers involved in Ground Disturbance Activities.

The archaeological monitor(s) shall observe all Ground Disturbance Activities on the Project Site that involve native soils. If Ground Disturbance Activities are occurring simultaneously at multiple locations on the Project Site, the principal archaeologist shall determine if additional monitors are required for other locations where such simultaneous Ground Disturbance Activities are occurring. The on-site archaeological monitoring shall end when the archaeological monitor determines that monitoring is no longer necessary.

c. Geology and Soils

Mitigation Measure GEO-MM-1: The services of a Project paleontologist who meets the Society of Vertebrate Paleontology standards (including a graduate degree in paleontology or geology and/or a publication record in peer reviewed journals, with demonstrated competence in the paleontology of California or related topical or geographic areas, and at least two full years of experience as assistant to a Project paleontologist), shall be retained prior to ground disturbance activities associated with Project construction in order to develop a site-specific Paleontological Resource Mitigation and Treatment Plan. The Paleontological Resource Mitigation and Treatment Plan shall specify the levels and types of mitigation efforts based on the types and depths of ground disturbance activities and the geologic and paleontological sensitivity of the Project Site. The Paleontological Resource Mitigation and Treatment Plan shall also include a description of the professional qualifications required of key staff, communication protocols during construction, fossil recovery protocols, sampling protocols for microfossils, laboratory procedures, reporting requirements, and curation provisions for any collected fossil specimens.

This Project paleontologist shall supervise a paleontological monitor who shall monitor all ground disturbance activities within Pleistocene age older alluvial deposits and the Palos Verdes Sand in order to identify potential paleontological remains. If significantly disturbed deposits or younger deposits too recent to contain paleontological resources are encountered during construction, the Project paleontologist may reduce or curtail monitoring in those affected areas, after consultation with the Applicant and the Los Angeles Department of City Planning's Office of Historic Resources.

d. Hazards and Hazardous Materials

Mitigation Measure HAZ-MM-1: Soil Management Plan (SMP)—The Project Applicant shall implement the SMP prepared by Geosyntec, provided as Appendix B of the Site Summary Report, which shall be submitted to the City of Los Angeles Department of Building and Safety for review and approval prior to the commencement of excavation and grading activities. The entire Project Site shall be subject to the general protocols described in the SMP regarding prudent precautions and general observations and evaluations of soil conditions to be implemented throughout earthwork, grading, excavation, or other soil disturbance activities on the Project Site.

The protocols in the SMP include, but are not limited to, the following:

- Special precautions shall be taken to manage soils that will be disturbed during Project earthwork activities in areas containing Chemicals of Concern (COCs) above screening levels (SLs). These areas include the former Texaco gas station and other select areas of the Project Site with elevated total petroleum hydrocarbons (TPH) and arsenic in shallow soil, as shown in the Site Summary Report. Soil in these areas of the Project Site with residual COCs above SLs shall either be excavated prior to commencing excavation and grading operations in these areas or segregated and stockpiled prior to off-site disposal.
- The following requirements and precautionary actions shall be implemented when disturbing soil at the Project Site other than imported backfill: no soil disturbance or excavation activities shall occur without a Project Site-specific Health and Safety Plan (HASP). Any soil that is disturbed, excavated, or trenched due to on-site construction activities shall be handled in accordance with applicable local, state, and federal regulations. Prior to the re-use of the excavated soil or the disposal of any soil from the Project Site, the requirements and guidelines in the SMP shall be implemented. The General Contractor shall conduct, or have its designated subcontractor conduct, visual screening of soil during activities that include soil disturbance. If the General Contractor or

subcontractor(s) encounter any soil that is stained or odorous (Suspect Soil), the General Contractor and subcontractor(s) shall immediately stop work and take measures to not further disturb the soils (e.g., cover suspect soil with plastic sheeting) and inform the property owner's representative and the environmental monitor. The environmental monitor, an experienced professional trained in the practice of the evaluation and screening of soil for potential impacts working under the direction of a licensed Geologist or Engineer, shall be identified by the property owner prior to the beginning of work.

- If Suspect Soil is encountered on the Project Site, the environmental monitor shall collect samples for analysis to characterize the soil for potential on-site re-use or off-site disposal per the provisions provided in the SMP.
- Prior to excavation activities, the General Contractor or designated subcontractor shall establish specific areas for stockpiling Suspect Soil, should it be encountered, to control contact by workers and dispersal into the environment, per the provisions provided in the SMP.
- In the event of soil import to the Project Site, soil must be screened and evaluated in accordance with the Department of Toxic and Substance Control (DTSC) advisory regarding clean imported fill material. The General Contractor or designated subcontractor shall require that the source of the imported soil provide documentation of such evaluation.

- The General Contractor shall ensure that on-site construction personnel comply with all applicable federal, state, and local regulations, as well as the State of California Construction Safety Orders (Title 8). Additionally, if Suspect Soil is expected to be encountered, personnel working in that area shall comply with California Occupational Safety and Health Administration regulations specified in CCR Title 8, Section 5192. The General Contractor shall prepare a Project-specific HASP. It is the responsibility of the General Contractor to review available information regarding Project Site conditions, including the SMP, and potential health and safety concerns in the planned area of work. The HASP should specify COC action levels for construction workers and appropriate levels of personal protective equipment (PPE), as well as monitoring criteria for increasing the level of PPE. The General Contractor and each subcontractor shall require its employees who may directly contact Suspect Soil to perform all activities in accordance with the General Contractor and subcontractor's HASP. If Suspect Soil is encountered, to minimize the exposure of other workers to potential contaminants on the Project Site, the General Contractor or designated subcontractor

may erect temporary fencing around excavation areas with appropriate signage as necessary to restrict access and to warn unauthorized on-site personnel not to enter the fenced area.

- The General Contractor shall implement the following measures as provided in the SMP to protect human health and the environment during construction activities involving contact with soils at the Project Site: decontamination of construction and transportation equipment; dust control measures; storm water pollution controls and best management practices; and proper procedures for the handling, storage, sampling, transport and disposal of waste and debris.
- In the event volatile organic compound (VOC)-contaminated soil is encountered during excavation on-site, a South Coast Air Quality Management District (SCAQMD) Rule 1166 permit shall be obtained before resuming excavation. Rule 1166 defines VOC-contaminated soil as a soil which registers a concentration of 50 ppm or greater of VOCs as measured before suppression materials have been applied and at a distance of no more than three inches from the surface of the excavated soil with an organic vapor analyzer calibrated with hexane. Either a SCAQMD Various Locations permit and plan, or a Project Site-specific permit and plan shall be required, depending upon the volume of soil to be excavated. Notifications, monitoring, and reporting related to the SCAQMD Rule 1166 permit shall be the responsibility of the General Contractor. If a Rule 1166 permit is required, an air monitoring plan may be required by the SCAQMD. Air monitoring plans are intended to protect the surrounding community from harmful exposure to VOCs and typically entail stationary monitoring stations for sample collection for laboratory analysis. Protection of on-site construction workers shall be accomplished by the development and implementation of the HASP.
- Known below-grade structures at the Project Site (i.e., storm water infrastructure) shall be removed from the ground or cleaned, backfilled, and left in place as appropriate during grading and excavation. If unknown below-grade structures are encountered during Project Site grading and excavation, the General Contractor shall promptly notify the property owner's representative the same day the structure is discovered. Based on an evaluation of the unknown below-grade structure by the appropriate professional (e.g., environmental monitor, geotechnical engineer), the property owner shall address the below-grade structure in accordance with applicable laws and regulations.

Mitigation Measure HAZ-MM-2: During construction activities at the Project Site, controls shall be in place to mitigate the effects of subsurface gases

and impacted soil and groundwater on workers and the public. During construction, the following shall be implemented:

- Monitoring devices for methane and benzene shall be present to alert workers of elevated gas concentrations when basement or subsurface soil disturbing work is being performed;
- Contingency procedures shall be in place if elevated gas concentrations are detected such as the mandatory use of PPE, evacuating the area, and/or increasing ventilation within the immediate work area where the elevated concentrations are detected;
- Workers shall be trained to identify exposure symptoms and implement alarm response actions;
- Soil and groundwater exposed during excavations shall be minimized to reduce the surface area which could off-gas. This shall be achieved by staggering exposed excavation areas;
- Soil removed as part of construction shall be sampled and tested for off-site disposal in a timely manner. If soil is stockpiled prior to disposal, it shall be managed in accordance with the Project's Storm Water Pollution Prevention Plan (SWPPP);
- Fencing shall be erected to limit public access and allow for gas dilution; and
- A HASP shall be prepared to describe the proposed construction activities and hazards associated with each activity. Hazard mitigation shall be presented in the HASP to limit construction risks to workers. The HASP shall include emergency contact numbers, maps to the nearest hospital, gas monitoring action levels, gas response actions, allowable worker exposure times, and mandatory PPE requirements. The HASP shall be signed by all workers on-site to demonstrate their understanding of the construction risks.

e. Noise

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

- Along the eastern property line of the Project Site between the construction areas and the adjacent residential and park uses to the east, the temporary sound barrier shall be designed to provide a minimum 16-A-weighted decibels (dBA) noise reduction at the ground level of receptor locations R1 and R2.

- Along the northern property line of the Project Site between the construction areas and the motel (receptor location R3) and school (receptor location R4) on the north side of Beverly Boulevard and the residential uses along Orange Grove Avenue, Ogden Drive, Genesee Avenue, and Spaulding Avenue (represented by receptor location R5), the temporary sound barrier shall be designed to provide a minimum 9-dBA, 5-dBA and 8-dBA noise reduction at the ground level of receptor locations R3, R4, and R5 respectively.
- Along the western and a portion of the southern property lines of the Project Site between the construction areas and residential uses on Hayworth Avenue (receptor location R7) and the residential and motel uses on the west side Fairfax Avenue (receptor location R8), the temporary sound barrier shall be designed to provide a minimum 15-dBA and 10-dBA noise reduction at the ground level of receptor locations R7 and R8, respectively.

12. Summary of Alternatives

This Draft EIR examined five alternatives to the Project in detail, which include Alternative 1, No Project/No Build Alternative; Alternative 2, Development in Accordance with Existing Zoning Alternative; Alternative 3, Reduced Density Alternative; Alternative 4, Mixed-Use Alternative; and Alternative 5, Above-Ground Parking Alternative. Refer to Section V, Alternatives, of this Draft EIR for a more detailed description of these alternatives, a comparative analysis of the impacts of these alternatives with those of the Project, and a description of the alternatives considered but rejected as infeasible.

a. Alternative 1: No Project/No Build Alternative

Alternative 1 assumes that the Project would not be approved, no new permanent development would occur within the Project Site, and the existing environmental setting would be maintained. Under Alternative 1, the physical conditions of the Project Site would generally remain as they were at the time the NOP was published for the Project. Specifically, the existing buildings and uses, as well as the surface parking areas, would remain on the Project Site, and no new construction would occur aside from ongoing production activities.

Alternative 1 would avoid the Project's significant and unavoidable impacts with respect to regional construction emissions; regional emissions associated with concurrent construction and operations; on- and off-site noise sources during construction; and on- and off-site vibration (related to the significance threshold for human annoyance) during construction. In addition, Alternative 1 would avoid the Project's less-than-significant-with-mitigation impacts, including those related to localized air quality emissions during

construction, paleontological resources, hazards, and groundwater quality. Impacts associated with the remaining environmental issues also would be less than those of the Project.

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

Alternative 2 would involve buildout of the Project Site in accordance with the existing zoning and land use regulations for the Project Site. Alternative 2 would include a total of an estimated 1,600,666 square feet of studio-related development and an FAR of 1.49:1. Alternative 2 assumes the construction of an estimated 856,986 square feet of new studio-related general office uses and the retention of an estimated 743,680 square feet of existing development. No demolition would occur under Alternative 2. New development would include a 15-story office building (maximum height of 203 feet) with four levels of subterranean parking and three levels of above-ground parking, and a six-level parking structure (maximum height of 66 feet) with two levels of subterranean parking. Approximately 4,550 parking spaces would be provided.

Alternative 2 would not avoid or substantially reduce the Project's significant and unavoidable impacts with respect to Project-level and cumulative regional construction emissions; regional emissions associated with concurrent construction and operations; Project-level and cumulative on- and off-site noise during construction; and Project-level on-site vibration and Project-level and cumulative off-site vibration (related to the significance threshold for human annoyance) during construction. These impacts would continue to be significant and unavoidable under Alternative 2 although the duration of such impacts would be reduced due to the overall reduction in building area and associated construction activities.

Additionally, Alternative 2 would reduce several of the less-than-significant-with-mitigation impacts associated with the Project, specifically with respect to archaeological resources; paleontological resources; and hazards and hazardous materials during construction. Alternative 2 would also result in similar less-than-significant-with-mitigation impacts as the Project with regard to localized construction-related emissions.

Furthermore, Alternative 2 would result in similar less-than-significant impacts as the Project with regard to energy efficiency; geologic hazards; surface water quality and groundwater hydrology during operations; on- and off-site construction-related vibration pursuant to the significance threshold for building damage; freeway safety; and consistency with transportation plans, programs, and policies.

Alternative 2 would reduce several of the less-than-significant impacts associated with the Project, specifically with respect to regional and localized operational emissions; TACs during construction and operation; historical resources; GHG emissions; hazards and hazardous materials during operation; surface water hydrology during construction; surface water quality; groundwater hydrology during construction; groundwater quality; land use and planning; on- and off-site operational noise; on- and off-site operational vibration (related to the significance threshold for building damage); fire protection; police protection; VMT; tribal cultural resources; water supply and infrastructure; wastewater; and energy and telecommunications infrastructure.

c. Alternative 3: Reduced Density Alternative

Alternative 3 would involve a 20-percent reduction in the Project's proposed development program (set forth in Section II, Project Description, of this Draft EIR). Alternative 3 consists of the same general site plan as the Project but with certain reduced building heights and square footages. Alternative 3 would include a total of an estimated 1,499,200 square feet of development (FAR of 1.4:1), including an estimated 280,000 square feet of sound stages, 83,200 square feet of production support, 560,000 square feet of production office, 560,000 square feet of general office, and 16,000 square feet of retail uses. Alternative 3 would involve the construction of an estimated 1,251,380 square feet of new development, the demolition of 495,860 square feet of existing studio-related uses and the retention of an estimated 247,820 square feet of existing studio-related uses. Approximately 4,240 parking spaces would be provided.

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

Alternative 3 would result in similar less-than-significant-with-mitigation impacts as the Project with regard to localized construction-related emissions; archaeological resources; geology and soils; paleontological resources; and hazards and hazardous materials during construction.

Furthermore, Alternative 3 would result in similar less-than-significant impacts as the Project with regard to historic resources; energy; surface water and groundwater hydrology; land use and planning; on- and off-site construction-related vibration based on the significance threshold for building damage; consistency with transportation plans,

programs, and policies; tribal cultural resources; and water supply and infrastructure during construction.

Alternative 3 would reduce several of the less-than-significant impacts associated with the Project, specifically regional and localized emissions during operation; TACs; GHG emissions; hazards and hazardous materials during operation; surface water and groundwater quality; operational noise; operational vibration; fire protection; police protection; VMT; freeway safety; water supply and infrastructure during operation; wastewater; and energy and telecommunications infrastructure.

d. Alternative 4: Mixed-Use Alternative

Alternative 4 would involve a mixed-use development with studio, residential, and retail uses. Alternative 4 would be developed in accordance with the existing zoning and land use designations for the Project Site and a permitted FAR of up to 3.75:1 per Transit Oriented Community (TOC) Tier 3. Alternative 4 would include a total of 3,696,370 square feet of development (FAR of 3.45:1), including approximately 2,772,000 square feet of residential uses and 924,370 square feet of commercial uses. Alternative 4 assumes the construction of 3,047,400 square feet of new development, the demolition of 94,710 square feet of existing studio-related uses, and the retention of 648,970 square feet of existing studio-related uses. In addition to residential uses, this alternative would include 36,000 square feet of sound stages, 41,400 square feet of production support, 138,000 square feet of general office uses, and 60,000 square feet of retail uses. The residential uses would include 3,680 units within three residential towers, with a mix of studios and one-, two- and three-bedroom units, of which 14 percent (516 units) would be affordable units for Very Low-Income households. The residential towers would be located along the western side of the Project Site and consist of 30 stories over a six-level parking podium (maximum height of 400 feet), with ground floor retail uses and four levels of subterranean parking. New development on the eastern portion of the Project Site would include a six-story office building (maximum height of 90 feet) with two levels of subterranean parking, a four-story production support building (maximum height of 60 feet) connected two single-story sound stages (maximum height of 60 feet), and a four-level parking structure (maximum height of 45 feet) with three levels of subterranean parking. Approximately 5,880 parking spaces would be provided.

Alternative 4 would not avoid the Project-level and cumulative significant and unavoidable impacts with respect to regional construction emissions; regional emissions associated with concurrent construction and operations; Project-level and cumulative on- and off-site noise during construction; and Project-level on-site vibration and Project-level and cumulative off-site vibration (based on the significance threshold for human annoyance) during construction. These impacts would continue to be significant and unavoidable under Alternative 4. The duration of the construction noise and vibration

impacts, and the concurrent construction and operational regional air quality impacts would increase due to the increase in building area and overall construction activities. The duration of the regional air quality impact during construction would decrease due to the reduction in overall grading. Moreover, the significant and unavoidable impacts with respect to regional emissions associated with concurrent construction and operations and on- and off-site construction noise would be greater under Alternative 4. In addition, regional operational emissions of VOCs and NOx under Alternative 4 would result in new significant and unavoidable air quality impacts that would not occur under the Project.

Alternative 4 would reduce some of the less-than-significant-with-mitigation impacts associated with the Project, specifically archaeological resources, paleontological resources, and hazards and hazardous materials during construction. Alternative 4 would also result in similar less-than-significant-with-mitigation impacts as the Project with regard to localized emissions during construction and geologic hazards.

In addition, Alternative 4 would result in greater less-than-significant impacts than the Project, including localized air emissions and TACs during operation, GHG emissions during operation, hazards and hazardous materials during operation, surface water quality and groundwater quality during operation, operational noise and vibration, fire protection, police protection, VMT, freeway safety, water supply and infrastructure during operation, wastewater, and energy and telecommunications infrastructure. In addition, Alternative 4 would result in substantially increased building heights and overall density than the Project, which could be considered incompatible with the predominantly low- and mid-rise land uses in the surrounding area. Furthermore, although not considered significant impacts on the environment, Alternative 4 would result in greater aesthetic and shading impacts than the Project.

Alternative 4 would result in similar less-than-significant impacts as the Project with regard to TACs during construction, historical resources; energy, GHG emissions during construction, surface water and groundwater hydrology during operation, surface water quality during construction, land use and planning, and consistency with transportation plans, programs, and policies.

Alternative 4 would reduce several of the less-than-significant impacts associated with the Project, specifically surface water hydrology during construction, groundwater hydrology and quality during construction, tribal cultural resources, and water supply and infrastructure during construction.

e. Alternative 5: Above-Ground Parking Alternative

Alternative 5 has been designed to reduce the Project's construction-related impacts by eliminating subterranean parking and therefore minimizing soil excavation and export. Alternative 5 would include the same proposed development program, square footages, and general layout as the Project, except that all parking would be located in above-ground structures. As a result, building heights would increase. Alternative 5 would involve the same demolition and retention of existing uses and the same FAR as the Project. Approximately 5,300 parking spaces would be provided.

Alternative 5 would reduce the Project-level and cumulative significant and unavoidable construction-related regional air quality NO_X impacts to a less-than-significant level with mitigation by eliminating subterranean parking in order to reduce excavation and the export of soil. However, Alternative 5 would not avoid the Project's significant and unavoidable impacts with respect to regional NO_X and VOC emissions associated with concurrent construction and operations; Project-level and cumulative on- and off-site noise during construction; or Project-level on-site vibration and Project-level and cumulative off-site vibration (based on the significance threshold for human annoyance) during construction. These impacts would continue to be significant and unavoidable and would be similar to the Project's, with the exception of (a) the air quality impact related to concurrent construction and operations, which would be less than under the Project due to the reduction in earthwork; and (b) off-site construction noise, which would only occur during nighttime hours over the course of five days and, thus, would be substantially reduced in comparison to the Project. The duration of the regional NO_X and VOC emissions impacts associated with concurrent construction and operations and the significant noise and vibration impacts would be reduced due to the reduction in grading and the overall length of the construction schedule.

Alternative 5 would result in similar less-than-significant-with-mitigation impacts as the Project with regard to geologic hazards. Alternative 5 would also reduce several of the construction-related less-than-significant-with-mitigation impacts associated with the Project, including localized emissions during construction; archaeological resources; paleontological resources; and hazards and hazardous materials during construction.

Alternative 5 would result in similar less-than-significant impacts as the Project with regard to regional operational emissions; localized emissions during operation; TACs during operation; historical resources; energy efficiency; GHG emissions during operation; hazards and hazardous materials during operation; surface water hydrology; surface water quality during operation; groundwater hydrology during operation; groundwater quality during operation; land use and planning; noise during operation; vibration (based on the significance threshold for building damage) during construction; vibration during operation; fire protection; police protection; transportation (including policy consistency, VMT impacts,

and freeway safety); water supply and infrastructure during operation; wastewater; and energy and telecommunications infrastructure during operation.

Alternative 5 would reduce several of the construction-related less-than-significant impacts associated with the Project, including localized emissions during construction; TACs during construction; archaeological resources; paleontological resources; GHG emissions during construction; hazards and hazardous materials during construction; surface water quality during construction; groundwater hydrology and quality during construction; tribal cultural resources; water supply and infrastructure during construction; and energy and telecommunications infrastructure during construction.

f. Environmentally Superior Alternative

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

With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible alternatives includes Alternative 1, No Project/No Build Alternative; Alternative 2, Development in Accordance with Existing Zoning Alternative; Alternative 3, Reduced Density Alternative; Alternative 4, Mixed-Use Alternative; and Alternative 5, Above-Ground Parking Alternative. A detailed description of the potential impacts associated with each alternative is provided in Section V, Alternatives, of this Draft EIR. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the Project.

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project/No Build Alternative, would avoid all of the Project's significant environmental impacts.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that Alternative 5, the Above-Ground Parking Alternative, would be the Environmentally Superior Alternative. As discussed above, although Alternative 5 would not eliminate all of the Project's significant and unavoidable impacts, Alternative 5 would reduce the Project-level and cumulative construction-related regional air quality impacts related to NO_X emissions from a significant and unavoidable level to a less-than-significant level with mitigation by eliminating subterranean parking that reduces

excavation and the export of soil. Alternative 5 would also reduce the Project-level and cumulative air quality impacts related to concurrent construction and operations and would substantially reduce the Project's off-site construction noise impact, although these impacts would remain significant and unavoidable. Alternative 5 would result in the same significant and unavoidable impacts related to on-site noise during construction and on- and off-site vibration during construction (based on the significance threshold for human annoyance). In addition, Alternative 5 would result in the same significant cumulative impacts that cannot feasibly be mitigated with regard to on-site construction noise and off-site construction vibration (based on the significance threshold for human annoyance). The duration of the regional NO_X and VOC emissions impacts associated with concurrent construction and operations and the significant noise and vibration impacts would be reduced due to the reduction in grading and the overall length of the construction schedule.

Of the Project's less-than-significant-with-mitigation impacts, Alternative 5 would result in similar less-than-significant-with-mitigation impacts as the Project with regard to geologic hazards. Alternative 5 would also reduce several of the construction-related less-than-significant-with-mitigation impacts associated with the Project, including localized emissions during construction; archaeological resources; paleontological resources; and hazards and hazardous materials during construction. Of the Project's less-than-significant impacts, those related to construction activities or occurring during construction would generally be less than the Project's impacts due to the reduction in soil import/export, while those related to operational activities would be the same as under the Project. Under Alternative 5, no environmental impacts would be greater than the Project. Thus, of the range of alternatives analyzed, Alternative 5, the Above-Ground Parking Alternative, would be the Environmentally Superior Alternative.

However, as previously discussed, Alternative 5 would not meet the underlying purpose of the Project as effectively as the Project since the elimination of subterranean parking would compromise and require changes to the Project's internal circulation plan, resulting in reduced integration of the production staging, loading, and basecamp areas with sound stages and filming areas, thereby making studio operations less efficient and flexible. These sub-optimal production operations would jeopardize the economic viability of the sound stages. Additionally, Alternative 5 would only partially meet the following Project objectives or would not meet the objectives as well as the Project, generally due to the elimination of the Project's subterranean parking and resulting effects on internal circulation and production efficiencies, as well as the increased building massing:

- Create a fully integrated and cohesive master planned site regulated by a Specific Plan that retains the Project Site's land use as a studio facility and provides an expandable, flexible, and operationally seamless production ecosystem that is able to respond to evolving market demands, support content creation, and maximize studio production capabilities.

- Optimize the currently underutilized Project Site to address past ad hoc building additions and meet the existing unmet and anticipated future demands of the entertainment industry by providing new technologically advanced sound stages combined with an adequate and complementary mix of state-of-the-art production support facilities and production offices.

- Complement the neighboring community through design elements that would be compatible with surrounding uses, concentrate building mass and height towards the center of the Project Site, and provide an enhanced public realm to promote walkability, foster connectivity and safety, and better integrate on- and off-site uses.

- Provide adequate, safe, and efficient ingress/egress, circulation, staging, and parking that satisfies the unique demands of a large-scale production studio with direct, enhanced access to the uses on-site and sufficient truck and trailer circulation areas, in compliance with modern fire and life safety requirements. Create multiple production basecamps to allow for the flexible and efficient staging of vehicles needed for film and television productions.

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

- Permit a reasonable, risk-adjusted return on investment commensurate with the Project Applicant's fiduciary responsibilities and allow for sustained economic viability and growth in an evolving entertainment market, while generating tax and property revenues to the City.