VI. Other CEQA Considerations

VI. Other CEQA Considerations

1. Significant Unavoidable Impacts

CEQA Guidelines Section 15126.2(c) requires that an EIR describe any significant impacts which cannot be avoided. Specifically, Section 15126.2(c) states:

> *Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.*

As evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, and summarized below, implementation of the Project would result in potentially significant impacts that cannot be feasibly mitigated with regard to regional construction-related emissions of nitrogen oxides (NO_X); on- and off-site construction noise; and on- and off-site construction vibration with respect to human annoyance. Cumulative impacts associated with regional construction-related NO_X emissions, on- and off-site construction noise, and on-site construction vibration with respect to human annoyance would also be significant and unavoidable. These construction noise and vibration impacts would also be significant and unavoidable under the long-term buildout scenario. In addition, both Project-level and cumulative impacts associated with emissions of NOx would be significant and unavoidable under a long-term buildout scenario due to concurrent construction and operations.[1]

a. Air Quality (Regional Construction Emissions)

As discussed in Section IV.B, Air Quality, of this Draft EIR, Project buildout may occur in one phase, with a total construction period of approximately 39 months. Construction could begin as soon as 2025 and end as soon as 2028. However, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year

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

to approximately 2045.[2] The analysis provided in Section IV.B, Air Quality, of this Draft EIR assumes a 2028 buildout year to provide a conservative evaluation.

As discussed in detail in Section IV.B, Air Quality, of this Draft EIR, construction-related daily maximum regional construction emissions would exceed the South Coast Air Quality Management District (SCAQMD) daily regional significance threshold for NO_X and, as such, would result in a potential short-term significant impact related to NO_X. Implementation of Mitigation Measures AIR-MM-1 through AIR-MM-4 would reduce construction emissions. However, peak daily regional NO_X emissions would still exceed the SCAQMD regional threshold of 100 pounds per day. Therefore, Project construction would result in a potentially significant Project-level and cumulative impact related to regional NO_X emissions even with the incorporation of feasible mitigation measures. Although temporary, this impact would be significant and unavoidable.

As also discussed in Section IV.B, Air Quality, extending the buildout year to approximately 2045 has the potential to result in concurrent construction and operational activities. Analysis of these concurrent activities assumed that the entire Project Site, with the exception of the southwestern portion of the Project Site, which includes sound stages and office uses, would be built out and operational by 2028, while construction activities were assumed to occur at lesser intensity compared to maximum daily intensity as would occur during the shorter 39-month construction duration. As shown in Table IV.B-14 in Section IV.B, Air Quality, of this Draft EIR, regional NOx and VOC emissions would exceed the SCAQMD regional operational significance threshold (55 pounds per day) and result in a temporary air quality impact. Implementation of Mitigation Measure AIR-MM-1, which involves the use of USEPA Tier 4 emissions compliant construction equipment, as well as Mitigation Measure AIR-MM-5, which would require that all landscaping equipment used on-site be electric powered, would reduce construction and operational emissions. Accordingly, peak daily emissions would be reduced below the SCAQMD thresholds for VOC. However, NO_x emissions resulting from concurrent construction and operational activities under the Long-Term Buildout scenario would also exceed both construction and operational SCAQMD significance thresholds. As such, Project construction under the Long-Term Buildout scenario would result in a potentially significant Project-level and cumulative impact related to regional NO_X emissions, even with the incorporation of feasible mitigation measures. Although temporary, this impact would be significant and unavoidable.

[2] *Construction would not occur continuously over the 20-year term and buildings could be constructed in phases at any time over this term.*

b. On-Site Construction Noise

As discussed in Section IV.K, Noise, of this Draft EIR, the estimated noise levels during Project construction would exceed the significance thresholds at receptor locations R1 through R5, R7 through R10, R12, and R13, ranging from 0.6 dBA at receptor location R5 to 21.8 dBA at receptor location R8. The estimated noise levels during all stages of Project construction would be below the significance thresholds at off-site receptor locations R6, R11, R14, and R15.

Concrete mat pour activities could extend into the nighttime hours, if a temporary noise variance is approved by the Los Angeles Board of Police Commissioners. In addition, the temporary dewatering activities during the Project demolition and grading stages would include dewatering pumps, which would operate 24 hours per day. The estimated construction-related noise due to the nighttime concrete mat pour would exceed the significance thresholds at off-site receptor locations R1, R3, R7, R8, R10, R12, and R13, while the estimated noise levels from the dewatering pump operation would be below the significance threshold at all off-site receptor locations, except for receptor location R8.

Implementation of Mitigation Measure NOI-MM-1 (installation of temporary sound barriers during construction) would reduce the noise generated by on-site construction activities at the off-site sensitive uses by a range of 5 dBA to 20 dBA. The estimated construction-related noise levels at off-site sensitive receptor locations R1 through R5, R7, and R9 through R14 would be reduced to below a level of significance with implementation of Mitigation Measure NOI-MM-1 at the ground level. However, the temporary sound barriers of Mitigation Measure NOI-MM-1 would not be effective in reducing the construction-related noise levels for the upper levels of the multi-story residential buildings located along the west side of Radford Avenue (receptor location R3). In addition, the temporary sound barriers would reach the maximum noise reduction for receptor location R8. In order to be effective at the upper levels of the multi-story residential buildings, the temporary noise barrier would need to be as high as the building (up to 45 feet tall), which would not be feasible (i.e., cost prohibitive and impractical). Generally, installing a 45-foot-high temporary wall is not a financially or logistically practical solution and would be extremely difficult to implement. At 45 feet in height, there is a significant increase in wind loading, which typically requires lateral bracing. In addition, the 45-foot temporary sound barrier would interfere with the construction sequencing requiring a complicated phased installation and removal. The added complexity would inhibit construction progress in this vicinity causing the overall construction duration to lengthen considerably. As such, there are no other feasible mitigation measures to further reduce the construction noise at receptor locations R3 and R8 to below the significance threshold. Therefore, temporary construction noise impacts associated with on-site noise sources would be potentially significant and unavoidable.

With regard to cumulative impacts, noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures for each individual related project and compliance with locally adopted and enforced noise ordinances. As provided in Section IV.K, Noise, of this Draft EIR, there would be potential cumulative noise impacts at the nearby sensitive uses (e.g., residential uses) located in proximity to the Project Site and Related Project Nos. 1, 2, 12, and 13 in the event of concurrent construction activities. Because the Project would have a significant and unavoidable impact related to on-site construction noise, the Project's contribution to construction noise impacts would be cumulatively considerable. As such, the Project's cumulative noise impacts from on-site construction would be potentially significant.

c. Off-Site Construction Noise

As discussed in Section IV.K, Noise, of this Draft EIR, construction haul trucks would travel between the Project Site and US-101 via Laurel Canyon Boulevard, Ventura Boulevard, Moorpark Street, Colfax Avenue, Carpenter Avenue, and Radford Avenue. As discussed in Section IV.K, Noise, of this Draft EIR, the hourly noise levels generated by Project construction trucks along the anticipated haul routes along Laurel Canyon Boulevard and Ventura Boulevard would be consistent with the existing daytime ambient noise levels for all construction stages, except along Radford Avenue, which would exceed the 5-dBA significance threshold by up to 6.1 dBA (L_{eq}). Conventional mitigation measures, such as providing temporary noise barrier walls to reduce the off-site construction truck traffic noise impacts would not be feasible as the barriers would obstruct the access and visibility to the properties along the anticipated haul route(s). As such, there are no other feasible mitigation measures to reduce the temporary significant noise impacts associated with the Project's off-site construction trucks. Therefore, noise impacts from Project-related off-site construction truck trips would be potentially significant and unavoidable.

In addition, the estimated noise levels due to the off-site improvements would exceed the 5-dBA significance threshold at receptor locations R1, R2, R3, R5, R8, R9, R13, and R14, ranging from 1.7 dBA (L_{eq}) at receptor location R2 to 26.1 dBA (L_{eq}) at receptor location R8. Temporary noise barriers, as specified in Mitigation Measure NOI-MM-2, would provide a minimum 5-dBA to 10-dBA reduction, which would reduce the perceptible sound level in half (which is considered a substantial reduction) at the off-site sensitive receptors. The estimated construction noise levels would be reduced to less than significant at receptor locations R2, R5, R9, and R14. However, noise impacts would remain significant at receptor locations R1, R3, R8, and R13 as the temporary moveable sound barrier would not be effective in reducing the construction noise at these locations due to limitation of the sound barrier height, and there are no feasible mitigation measures to reduce construction noise to

a less than significant level.[3] Therefore, temporary construction noise impacts associated with the off-site improvements would be potentially significant and unavoidable.

With regard to cumulative impacts, off-site construction haul trucks would have the potential to result in cumulative impacts if the trucks for the related projects and the Project were to utilize the same haul routes. As analyzed in Section IV.K, Noise, of this Draft EIR, the estimated off-site construction noise levels for the Project would exceed the significance thresholds along one of the anticipated truck routes, Radford Avenue. The estimated noise levels due to Project-related off-site construction trucks would be just below the 5-dBA threshold along Moorpark Street and Colfax Avenue. Therefore, any additional number of trucks from the Project and related projects would incrementally increase the noise levels, which may contribute to the exceedance of the 5-dBA threshold and result in cumulative impacts. Since Related Project Nos. 1, 2, 3, and 13 are located near the Project Site, they would have the potential to use the same construction routes as the Project. Therefore, cumulative noise due to construction truck traffic from the Project and other related projects would increase the ambient noise levels along the truck routes by 5 dBA along Moorpark Street, Colfax Avenue, and Radford Avenue. As such, the Project's cumulative noise impacts from off-site construction would be potentially significant.

d. On-Site Construction Vibration (Human Annoyance)

As discussed in Section IV.K, Noise, of this Draft EIR, per Federal Transit Administrator (FTA) guidance, the significance thresholds for human annoyance are 72 VdB for residential and hotel uses (receptor locations R1 through R5 and R7 through R15) and 75 VdB for school uses (receptor location R6), assuming there is a minimum of 70 vibration events occurring during a typical construction day. As discussed in detail in Section IV.K, Noise, of this Draft EIR, the estimated ground-borne vibration levels from construction equipment would be below the significance criteria for human annoyance at off-site sensitive receptor locations R2, R4, R5, R6, R7, and R9 through R15. However, the estimated vibration levels at receptor locations R1, R3, and R8 would exceed the 72-VdB significance threshold. The vibration impacts at receptor locations R1 and R3 are due to the use of vibratory rollers, which would be limited to short durations, approximately one day during paving of on-site driveways (with the vibratory roller operating within 140 feet of the receptor locations).

Mitigation measures considered to reduce vibration impacts from construction activities with respect to human annoyance included the installation of a wave barrier, which is typically a trench or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise). However, wave barriers must be very deep

[3] *Higher noise reduction would require fixed barriers, installed with foundation.*

and long to be effective, are cost prohibitive for temporary applications, such as construction, and are, therefore, considered infeasible. In addition, constructing a wave barrier to reduce the Project's construction-related vibration impacts would, in and of itself, generate ground-borne vibration from the excavation equipment. As such, there are no feasible mitigation measures to reduce the potential vibration human annoyance impacts. Thus, vibration impacts from on-site construction with respect to human annoyance would be significant and unavoidable.

With regard to cumulative impacts, as described in Section IV.K, Noise, of this Draft EIR, groundborne vibration decreases rapidly with distance. As such, potential vibration impacts due to construction activities are generally limited to buildings/structures that are located in proximity to the construction site (i.e., within 15 feet as related to building damage and 80 feet as related to human annoyance at residential uses). The closest related project to the Project Site would be Related Project No. 12, which would be located adjacent to the residential uses on the north side of the Los Angeles River (receptor locations R9, R10, R12, and R13), and Related Project No. 13, which would include construction adjacent to residential uses along Radford Avenue (receptor locations R1 and R3). Vibration levels from the related projects would exceed the 72-VdB human annoyance significance threshold at the adjacent receptor locations R1, R3, R10, R12, and R13. Therefore, potential cumulative construction vibration impact with respect to human annoyance associated with on-site construction would be potentially significant.

e. Off-Site Construction Vibration (Human Annoyance)

As discussed above, per FTA guidance, the significance threshold for human annoyance is 72 VdB for residential and hotel uses. The estimated vibration levels generated by construction trucks traveling along the anticipated haul routes were assumed to be driving a minimum of 27 feet from the nearest sensitive uses (i.e., the residential and hotel uses) along Laurel Canyon Boulevard, Ventura Boulevard, Moorpark Street, Colfax Avenue, and Radford Avenue.

As discussed in Section IV.K, Noise, of this Draft EIR, the temporary vibration levels could reach approximately 71 VdB periodically as trucks pass sensitive receptors along the anticipated haul route(s) at a distance of 27 feet, which would be below the 72-VdB significance threshold. However, construction trucks traveling in the alley for the off-site improvements would generate vibration up to 84 VdB at the motel use (receptor location R8), which would exceed the 72-VdB significance threshold.

In addition, off-site improvements would include the use of a vibratory roller for street and bike path paving, which would generate vibration. The estimated groundborne vibration levels from off-site construction equipment would be below the significance criterion for human annoyance at off-site sensitive receptor locations R2, R4, R6, R7, R8, and R10

through R15. However, the estimated vibration levels at receptor locations R1, R3, R5, and R9 would exceed the 72-VdB significance threshold. The vibration impacts at receptor locations R1, R3, R5, and R9 are due to the use of vibratory roller, which would be limited to short duration, approximately one day during paving of off-site roadway (with the vibratory roller operating within 140 feet of the receptor locations).

As previously discussed, mitigation measures considered to reduce vibration impacts from construction activities with respect to human annoyance included the installation of wave barriers, which are typically a trench or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise). However, wave barriers must be very deep and long to be effective, are cost prohibitive for temporary applications, such as construction, and are therefore considered infeasible. In addition, constructing a wave barrier to reduce the Project's construction-related vibration impacts would, in and of itself, generate ground-borne vibration from the excavation equipment. Furthermore, it would not be feasible to install a wave barrier along the public roadways for the off-site construction vibration impacts, as an open trench would block access to and from the sensitive receptor locations. In addition, the Applicant does not have a right to construct a wave barrier on properties they do not own; consequently, the wave barrier would need to be installed on the public sidewalk, which the City would not permit due to disruption of streets and sidewalks. As such, there are no feasible mitigation measures to reduce the potential vibration human annoyance impacts. Therefore, Project-level vibration impacts from off-site construction with respect to human annoyance would be potentially significant and unavoidable.

2. Reasons Why the Project is Being Proposed, Notwithstanding Significant Unavoidable Impacts

In addition to identification of a project's significant unavoidable impacts, CEQA Guidelines Section 15126.2(c) requires that an EIR describe the reasons why a project is being proposed, notwithstanding the effects of the identified significant and unavoidable impacts. The reasons why the Project has been proposed are grounded in the underlying purpose of the Project and the associated list of project objectives included in Section II, Project Description, of this Draft EIR.

As provided in Section II, Project Description, of this Draft EIR, the purpose of the Project is to maintain Radford Studio Center as a studio and to modernize and enhance production facilities within the Project Site to meet both the existing unmet and anticipated future demands of the entertainment industry, keep production activities and jobs in Los Angeles, upgrade utility and technology infrastructure, and create a cohesive studio lot. This purpose and associated objectives would support the objectives and policies of the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan, the City's General Plan Framework Element (Framework Element), and the Southern California Association of

Governments' (SCAG) Regional Transportation Plan/Sustainability Communities Strategy (RTP/SCS).

As discussed in Section IV.J, Land Use and Planning, of this Draft EIR, with regard to the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan, the Project would support the Community Plan's goal to support alternative modes of transportation to reduce vehicle trips, as well as the objective to pursue transportation demand management (TDM) strategies that can maximize vehicle occupancy, minimize average trip length, and reduce vehicle miles traveled (VMT). Specifically, the Project would increase urban density on an already developed urban infill site in close proximity to jobs, housing, shopping, services, and transit, including Los Angeles County Metropolitan Transportation Authority (Metro) and Los Angeles Department of Transportation (LADOT) DASH bus lines with stops in the vicinity of the Project Site along Ventura Boulevard and Laurel Canyon Boulevard. The Project would also support the Community Plan objectives and policies related to open space. The Project's open space and landscaping plan has been designed to enhance the public right-of-way along all Project Site frontages and enhance public access to the Los Angeles River and Tujunga Wash. Additionally, the Project would include mitigation measures to ensure the protection of potential historic structures within the Project Site, thereby supporting the Community Plan's goal and objective related to historic preservation.

With regard to the Framework Element, the Project would promote the City's policy to provide for the siting and design of new development that maintains the prevailing scale and character of the commercial and industrial districts by establishing height subareas (Subareas A through D) with specified height limits and limited height allowances to regulate building heights throughout the Project Site, with taller maximum heights concentrated in the center of the Project Site, away from Project Site edges. In addition, setbacks to be provided would function as buffers and transitional space around the Project Site perimeter. The proposed height subareas and associated setbacks and stepbacks would limit future development to concentrate building height toward the center of the Project Site and away from the existing commercial and residential uses, as well as the Los Angeles River and the Tujunga Wash. The Project would further support the City's objective to encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community, or the region by expanding upon existing studio uses within an area well-served by public transit, specifically Metro and DASH bus stops in close proximity to the Project Site. Additionally, the Project would make effective use of the built environment to help increase personal safety at all times of the day by incorporating elements that promote individual and community safety.

Furthermore, the Project would promote the City's objective to establish a balance of land uses that provide for commercial development, which meets the needs of local residents, sustains economic growth, and ensures environmental quality through the

development of a mix of integrated and supporting land uses within a single site. Specifically, the Project represents the continuation of an existing studio use and would involve the modernization and expansion of media production facilities within the approximately 55-acre Radford Studio Center to meet both the existing unmet and anticipated future demands of the entertainment industry and keep production activities, as well as jobs in Los Angeles, while rehabilitating and preserving the integrity of the existing historic resources on-site and in consideration of the surrounding uses. In addition, by providing Mobility Hub(s) on-site, the Project would facilitate a reduction in vehicle trips and VMT, in turn, reducing emissions. Furthermore, a number of specific sustainable design components would be incorporated into the Project. The Project would also be designed to meet LEED Gold or equivalent requirements and comply with the City's All-Electric Buildings Ordinance (Ordinance No. 187,714), as applicable. Such measures would address energy conservation, water conservation, and waste reduction.

The Project would also support Mobility Plan 2035, which is the Transportation Element of the General Plan, by implementing a TDM program to further reduce the number of single-occupancy vehicle trips and implementing pedestrian and streetscape enhancements to encourage walking. The Project also includes Mobility Hub(s) which would support first-mile/last-mile connections; encourage employee use of public transit, carpooling, vanpooling, and biking/scootering to work; and support other TDM strategies. In addition, the Project would provide short-term and long-term bicycle parking spaces in accordance with Los Angles Municipal Code (LAMC) requirements, including secured bicycle parking facilities, as well as showers, lockers, and bicycle service areas with repair stands within the Project Site. Along Radford Avenue, enhanced sidewalks and a landscaped setback are also proposed, along with a Class IV bikeway. Furthermore, the Applicant would contribute to traffic-calming measures as part of a Neighborhood Traffic Management Plan to address potential cut-through traffic on surrounding streets, as discussed in Section IV.M, Transportation, of this Draft EIR.

With regard to SCAG's RTP/SCS, the Project would support the 2024-2050 RTP/SCS policies to improve mobility and accessibility, support healthy and equitable communities, increase travel choices within the transportation system, reduce GHG emissions, promote active transportation (e.g., bicycling and walking), and encourage energy efficiency. The Project would increase urban density on an already developed urban infill site located within a SCAG-designated High Quality Transit Corridor (HQTC) in close proximity to housing, shopping, services, and transit. The Project would also provide pedestrian enhancements consistent with the Los Angeles River Revitalization Master Plan, including a new multi-modal bridge, the Radford Bridge. Along Radford Avenue, enhanced sidewalks and a landscaped setback are proposed, along with two Class IV bikeways; one from the Los Angeles River south to Hoffman Street and the second from the Los Angeles River north to the Radford Mobility Connector. In addition, the Project would provide short-term and long-term bicycle parking spaces in accordance with LAMC requirements and electric vehicle (EV)

charging stations and parking spaces capable of supporting future electric vehicle supply equipment (EVSE) in compliance with LAMC requirements.

Furthermore, as detailed in Section V, Alternatives, of this Draft EIR, other than Alternative 1 (No Project Alternative), none of the alternatives would eliminate all of the Project's significant and unavoidable impacts. In addition, the No Project Alternative would not achieve the Project's purpose or the associated Project objectives. As discussed in detail in Section V, Alternatives, of this Draft EIR, the environmentally superior alternative, Alternative 4 (the Reduced Excavation/Grading Alternative), would reduce, but not eliminate the Project's significant regional construction-related air quality impact; the regional air quality impact associated with concurrent construction and operation; and the construction-related noise and vibration impacts. Alternative 4 would also substantially increase building massing on-site due to several multi-level parking podiums needed to accommodate required parking, resulting in greater impacts than the Project related to aesthetics, though these impacts would remain less than significant pursuant to SB 743. Alternative 4 would meet the underlying purpose of the Project; however, due to the elimination of below-grade parking, and subsequent relocation to at- or above-grade parking structures, operational inefficiencies are increased, and compatibility with neighboring uses is reduced. As such, Alternative 4 would only partially meet or not meet many of the Project objectives as well as the Project.

Based on the above, the Project reflects a development program that is consistent with the overall vision of the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan, as well as with other land use plans such as the City's Framework Element and SCAG's RTP/SCS. Additionally, the Project's potentially significant and unavoidable impacts with regard to construction-related regional emissions, noise, and vibration would only occur during temporary and periodic construction activities, similar to those occurring at other development sites in urban areas, particularly within infill locations. As such, the benefits of the Project, as outlined above, would outweigh the effects of its temporary significant and unavoidable impacts. Furthermore, as detailed in Section V, Alternatives, of this Draft EIR, no feasible alternative was identified that would eliminate all of the Project's significant and unavoidable impacts.

3. Significant Irreversible Environmental Changes

CEQA Guidelines Section 15126.2(d) provides that an EIR must evaluate significant irreversible environmental changes that would be caused by implementation of a proposed project. As stated in CEQA Guidelines Section 15126.2(d), "[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the

project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified."

The Project would necessarily consume a limited amount of slowly renewable and non-renewable resources that could result in irreversible environmental changes. This consumption would occur during construction of the Project and would continue throughout its operational lifetime. The development of the Project would require a commitment of resources that would include (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources (e.g., fossil fuels) for electricity, natural gas, and transportation. As demonstrated below, the Project would not consume a large commitment of natural resources or result in significant irreversible environmental changes.

a. Building Materials and Solid Waste

Construction of the Project would require the consumption of resources that do not replenish themselves or which may renew so slowly as to be considered non-renewable. These resources would include certain types of lumber and other forest products, aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper and lead), and petrochemical construction materials (e.g., plastics).

The Project's potential impacts related to solid waste are addressed in Section IV.N.3, Utilities and Service Systems—Solid Waste, of this Draft EIR. As discussed therein, pursuant to the requirements of SB 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Furthermore, pursuant to LAMC Sections 66.32 through 66.32.5 (Ordinance No. 181,519), the Project's general contractor and/or subcontractors would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility. In addition, during operation, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires development projects to include an on-site recycling area or room of a specified size. As is the case under existing conditions, the Project would also comply with AB 939, AB 341, AB 1826, and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling, recycling of organic waste, and participation in the City's Curbside Recycling Program. Overall, the Project would adhere to State and local solid waste policies and objectives that further goals to divert waste. Thus, the consumption of non-renewable building materials, such as aggregate materials and plastics, would be reduced and the Project would not result in significant impacts regarding solid waste.

b. Water

Consumption of water during construction and operation of the Project is addressed in Section IV.O.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR. As evaluated therein, given the temporary nature of construction activities, the short-term and intermittent water use during construction of the Project would be less than the net new water consumption estimated for the Project at buildout, and such water demand during construction would be offset by the removal of the existing uses on the Project Site. During operation, the estimated water demand for the Project would not exceed the available supplies projected by the City of Los Angeles Department of Water and Power (LADWP), as confirmed by the Water Supply Assessment prepared by LADWP for the Project and included as Appendix Q of this Draft EIR. The Project would also be required to reduce indoor water use by at least 20 percent, in accordance with the Los Angeles Green Building Code. In addition, the Project would implement Project Design Feature WAT-PDF-1, which includes water conservation measures in excess of code requirements, such as high efficiency toilets, high efficiency shower heads, ENERGY STAR Certified residential dishwashers, drip/subsurface irrigation, and proper hydro-zoned irrigation. Thus, as evaluated in Section IV.O.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, while Project construction and operation would result in some irreversible consumption of water, the Project would not result in significant impacts related to water supply.

c. Energy Consumption

During ongoing operation of the Project, non-renewable fossil fuels would represent the primary energy source, and, thus, the existing finite supplies of these resources would be incrementally reduced. Fossil fuels, such as diesel, gasoline, and oil, would also be consumed in the use of construction vehicles and equipment. Project consumption of non-renewable fossil fuels for energy use during construction and operation of the Project is addressed in Section IV.E, Energy, of this Draft EIR. As discussed therein, construction activities for the Project would not require the consumption of natural gas but would require the use of fossil fuels and electricity. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. In addition, trucks and equipment used during construction activities would comply with CARB's anti-idling regulations, as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Further, on-road vehicles (i.e., haul trucks, worker vehicles) would be subject to federal fuel efficiency requirements. Therefore, construction of the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources. Thus, impacts related to the consumption of fossil fuels during construction of the Project would be less than significant.

During operation, the Project's increase in electricity demand would be within the anticipated service capabilities of LADWP. In compliance with City Ordinance No. 187,714 requiring new buildings to be all-electric (with certain exceptions included in the ordinance), the Project would result in a reduction in natural gas demand. In addition, as discussed in Section IV.E, Energy, of this Draft EIR, the Project would comply with all applicable energy conservation policies and plans, including the CALGreen Code incorporated in the Title 24 energy standards, the Los Angeles Green Building Code, the Green New Deal, and the RTP/SCS. Although final details regarding specific energy efficiency features and energy systems have not yet been determined, the Project would be required under Title 24 to include a PV system (on-site or off-site) or a combination of PV and battery system as part of the final design. In addition, compliance with Title 24 standards would ensure the use of energy efficient and energy conserving technologies and construction practices.

Regarding transportation uses, the Project location would reduce VMT in comparison to developments located in non-infill, non-urban areas and encourage the use of alternative modes of transportation. The Project would also be consistent with regional planning strategies that address energy conservation. As discussed above and in Section IV.J, Land Use and Planning, of this Draft EIR, SCAG's RTP/SCS focuses on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. The RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, reducing building energy use, improving jobs/housing balance, and increasing the use of renewable sources. The Project would be consistent with the energy efficiency policies emphasized in the RTP/SCS. Most notably, the Project is a commercial development located within an HQTC, as designated by SCAG, which indicates that the Project Site is an appropriate site for increased intensity and employment opportunities from a "smart growth" regional planning perspective. Local jurisdictions are encouraged to focus housing and employment growth within HQTCs to reduce VMT. The Project would provide new development in proximity to neighborhood services and would be well-served by existing public transportation, as evidenced by the Project Site's location within a designated HQTC. As discussed in Section IV.M, Transportation, of this Draft EIR, the Project Site is well-served by transit. As set forth in the Transportation Assessment, Metro operates three local lines in the vicinity of the Project Site, including Metro lines 218, 230, and 240. Additional transit lines in the Project vicinity include one LADOT DASH route. This would provide service within the Project vicinity and would provide employees and visitors with various public transportation opportunities. The Project would also provide Mobility Hubs to support first-mile/last-mile connections; encourage employee use of public transit, carpooling, vanpooling, and biking/scootering to work; and support other TDM strategies. The Project's generation of new job opportunities within an HQTC is also consistent with numerous policies in the 2024–2050 RTP/SCS related to locating new jobs near transit.

Based on the above, the Project would not cause the wasteful, inefficient, and unnecessary consumption of energy and would be consistent with the intent of Appendix F of the CEQA Guidelines. In addition, Project operations would not conflict with adopted energy conservation plans. Refer to Section IV.E, Energy, of this Draft EIR, for further analysis regarding the Project's consumption of energy resources.

d. Environmental Hazards

The Project's potential use of hazardous materials is addressed in Section IV.H, Hazards and Hazardous Materials, of this Draft EIR. As evaluated therein, operation of the Project would be expected to continue the on-site use and storage of potentially hazardous materials typical of those used in studio campuses, including paints, adhesives, fuels, pesticides for landscaping, cleaning and maintenance supplies, materials for pyrotechnic activities, and other general products related to studio operations. Construction of the Project would also involve the temporary use of potentially hazardous materials, such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners. However, all potentially hazardous materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Additionally, the existing plans and protocols currently implemented at the Project Site with regard to the handling of hazardous materials and wastes would be updated pursuant to Project Design Features HAZ-PDF-1 through HAZ-PDF-3. Furthermore, the Project Site is currently designated as a small quantity generator under the Resource Conservation and Recovery Act (RCRA), and the Applicant implements the life cycle provisions of both RCRA and the Hazardous Waste Control Law (HWCL) by maintaining the required inspection logs, manifests, and records, which are subject to review by the Los Angeles County Department of Health Services. In addition, the Applicant currently employs staff members trained in the appropriate standards for the management of hazardous waste and the clean-up of releases and uses licensed firms for the transport of hazardous waste. The Project would allow for the continued operation of the Project Site under these provisions, and the required records, training, and licensed transport would continue to be maintained, thus minimizing risks.

Additionally, any asbestos or lead based paint encountered during demolition and construction would be handled and disposed of in accordance with existing applicable regulations, and any contaminated soil would be handled and disposed of according to the Soil Management Plan prepared for the Project, as detailed in Mitigation Measure HAZ-MM-1.

Therefore, any associated risk due to the use or disposal of hazardous materials would be reduced to a less-than-significant level through implementation of Project Design Features HAZ-PDF-1 through HAZ-PDF-3 and Mitigation Measures HAZ-MM-1. As such, it

is not expected that the Project would cause irreversible damage from environmental accidents.

e. Conclusion

Based on the above, Project construction and operation would require the irreversible commitment of limited slowly renewable and non-renewable resources, which would reduce the availability of these resources for future generations or for other uses. However, the consumption of such resources would not be considered substantial and would be consistent with regional and local growth forecasts and development goals for the area. The loss of such resources would not be highly accelerated when compared to existing conditions, and such resources would not be used in a wasteful manner. Therefore, although irreversible environmental changes would result from the Project, such changes are concluded to be less than significant, and the limited use of nonrenewable resources that would be required by Project construction and operation is justified.

4. Growth-Inducing Impacts

CEQA Guidelines Section 15126.2(e) requires that growth-inducing impacts of a project be considered in a Draft EIR. Growth-inducing impacts are characteristics of a project that could directly or indirectly foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to the CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a wastewater treatment plant that, for example, may allow for more construction in service areas). In addition, as set forth in the CEQA Guidelines, increases in the population may burden existing community service facilities, thus requiring construction of new facilities that could cause significant environmental effects. The CEQA Guidelines also require a discussion of the characteristics of projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Finally, the CEQA Guidelines also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment.

a. Population

As discussed in Section II, Project Description, of this Draft EIR, the Project would involve the modernization and expansion of Radford Studio Center to meet the contemporary needs and changing demands of the entertainment industry. Since the Project does not propose a housing component, it would not directly induce a new residential population that would contribute to population growth in the vicinity of the Project Site or the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan area.

b. Employment

The Project would have the potential to generate indirect population growth in the vicinity of the Project Site as a result of the employment opportunities generated by the Project. During construction, the Project would create temporary construction-related jobs. However, the work requirements of most construction projects are highly specialized such that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. The Project would draw from the existing regional pool of construction workers who typically move from project to project as work is available. Project-related construction workers would not be anticipated to relocate their household's permanent place of residence as a consequence of working on the Project, and, therefore, no new permanent residents are expected to be generated during construction of the Project. Accordingly, Project construction would not induce substantial population growth.

As discussed in the Initial Study, included as Appendix A to this Draft EIR, the Project would generate an estimated total of 8,920 employees at buildout, for a net increase of 4,139 employees over existing conditions. Per the employment data from the 2024–2050 RTP/SCS, an estimated 2,047,263 employees are projected within the City of Los Angeles in 2028, the Project's earliest buildout year, with 51,813 new employees projected in the City between 2023 and 2028. The Project's net increase in employment of 4,139 employees would represent approximately 8 percent of the employment growth forecasted in the City between 2023 and 2028. Based on SCAG's 2024-2050 RTP/SCS, in 2045, the City of Los Angeles Subregion is anticipated to have approximately 2,107,819 employees. Therefore, the projected employment growth in the City between 2023 and 2045 based on SCAG's 2024–2050 RTP/SCS is approximately 130,155 employees. As such, in the event buildout of the Project potentially extends to 2045, the Project's estimated 4,139 net new employees would constitute approximately 3.2 percent of the employment growth forecasted between 2023 and 2045.

As described in Section II, Project Description, of this Draft EIR, the total sound stage and production support floor area permitted within the Project Site under the proposed Specific Plan may be increased up to a total of 575,000 square feet each in exchange for equivalent decreases in the floor area of other permitted uses, while production office, creative office, and retail cannot exceed 725,000 square feet, 700,000 square feet, and 25,000 square feet, respectively. Under the land use exchange program, the Project is estimated to generate a total of up to approximately 9,370 employees (approximately 4,589 net new employees when accounting for the estimated number of existing employees). The estimated 4,589 net new employees would constitute approximately 8.9 percent of the employment growth forecasted between 2023 and 2028. In addition, in the event buildout of the Project potentially extends to 2045, the estimated 4,589 net new employees would

constitute approximately 3.5 percent of the employment growth forecasted between 2023 and 2045.

Overall, the provision of new jobs would constitute a small percentage of the City's anticipated employment growth and would not be considered "unplanned growth." Furthermore, while some new Project employees may be anticipated to relocate to the Project vicinity, many would not; similarly, existing employees would not be expected to move as a result of redevelopment of the Project Site. Accordingly, this potential indirect increase in population would not be substantial. Specifically, some employment opportunities may be filled by people already residing in the vicinity of the Project Site, and it is anticipated that other employees would commute to the Project Site from other communities both in and outside of the City, as under existing conditions. The Project would also improve the jobs/housing balance of the region by providing additional employment opportunities in this area of the City. Therefore, given that the Project would not directly contribute to substantial population growth in the Project area through the development of residential uses, and since many of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site or who would commute to the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial.

Additionally, as the Project would be in an urbanized area with an established network of roads and other urban infrastructure, the Project would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth. The Project's Radford Mobility Connector is a Project amenity that would not induce population growth. In addition, as part of the TDM Program set forth in Project Design Feature TR-PDF-2 included in Section IV.M, Transportation, of this Draft EIR, Mobility Hubs would be located on-site to support first-mile/last-mile connections; encourage employee and visitor use of public transit, carpooling, vanpooling, and biking/scootering to work; and to support other TDM strategies.

c. Utility Infrastructure Improvements

The area surrounding the Project Site is already developed with a mix of residential and commercial uses, and the Project would not remove impediments to growth. The Project Site is located within an urban area that is currently served by existing utilities and infrastructure. As discussed in Sections IV.O.1, Utilities and Service Systems—Water Supply and Infrastructure, IV.O.2, Utilities and Service Systems—Wastewater, and IV.O.4, Utilities and Service Systems—Electric Power, Natural Gas, and Telecommunications Infrastructure, of this Draft EIR, while the Project would require local infrastructure to connect the Project Site to the mainlines, such improvements would be limited to serving Project-related demand and would not necessitate major local or regional utility infrastructure improvements that have not otherwise been accounted and planned for on a regional level.

d. Conclusion

Overall, the Project would be consistent with the growth forecast for SCAG's City of Los Angeles Subregion and would be consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of VMT. In addition, the Project would not require any major roadway improvements or open any large undeveloped areas for new use. Any access improvements would be limited to driveways necessary to provide immediate access to the Project Site and to improve safety and walkability. The Project's Radford Mobility Connector is a Project amenity that would not induce population growth. Therefore, direct and indirect growth-inducing impacts would be less than significant.

5. Potential Secondary Effects of Mitigation Measures

CEQA Guidelines Section 15126.4(a)(1)(D) states that "[i]f a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed." With regard to this section of the CEQA Guidelines, the potential impacts that could result with the implementation of each mitigation measure proposed for the Project were evaluated. The following provides a discussion of the potential secondary impacts that could occur as a result of the implementation of the proposed mitigation measures, listed by environmental issue area.

a. Air Quality

Mitigation Measures AIR-MM-1 to AIR-MM-5 are included in Section IV.B, Air Quality, of this Draft EIR, to reduce the Project's air quality emissions during construction and during potential concurrent construction and operation of the Project. Mitigation Measure AIR-MM-1 requires that, prior to demolition, a Project representative make available to the City of Los Angeles Department of Building and Safety and the South Coast Air Quality Management District a comprehensive inventory of all off road construction equipment, equal to or greater than 50 horsepower, that shall be used during any portion of construction. A copy of each unit's certified tier specification, Best Available Control Technology documentation, and 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. Furthermore, Mitigation Measure AIR-MM-2 requires that during excavation activities for the South Lot, CARB verified soil stabilizers be used on unpaved haul roads and that unpaved haul roads be covered with gravel with a maximum of five percent silt content. Additionally, Mitigation Measure AIR-MM-3 requires that the Project's truck operator(s)/construction contractor(s) use 2014 model year or newer engines that meet CARB's 2013 engine

emission standards of 0.02 grams per brake horsepower-hour (g/bhp-hr) for NO_X emissions or newer. Mitigation Measure AIR-MM-4 requires that all construction equipment be maintained and properly tuned in accordance with manufacturer's specifications and all equipment be checked by a certified mechanic and determined to be running in proper condition prior to operation. Lastly, Mitigation Measure AIR-MM-5 requires that during Project operations, all landscaping equipment used on-site be electric powered.

Implementation of Mitigation Measures AIR-MM-1 through AIR-MM-5 would be beneficial in addressing the Project's air quality impacts during construction and during concurrent construction and operation of the Project and would not result in any physical improvements that would have the potential to result in significant impacts. As such, implementation of Mitigation Measures AIR-MM-1 through AIR-MM-5 would not result in adverse secondary impacts.

b. Biological Resources

Mitigation Measures BIO-MM-1 and BIO-MM-2 are included in Section IV.C, Biological Resources, of this Draft EIR, to address potential Project impacts on biological resources. Specifically, Mitigation Measure BIO-MM-1 requires that tree and/or structure removal occur outside of the maternity roosting season for bats to avoid potential impacts to special-status bat species. In addition, if trees and/or structures are removed, a Qualified Biologist shall conduct a focused bat survey no less than seven days before scheduled tree/structure removal. Mitigation Measure BIO-MM-2 requires that specific best management practices be implemented during the construction process to ensure the protection of trees to be preserved.

Implementation of Mitigation Measures BIO-MM-1 and BIO-MM-2 would be beneficial in addressing the Project's potential impacts on biological resources during construction and would not result in any physical improvements that would have the potential to result in significant impacts. As such, implementation of Mitigation Measures BIO-MM-1 and BIO-MM-2 would not result in adverse secondary impacts.

c. Cultural Resources

Mitigation Measures CUL-MM-1 through CUL-MM-20 are included in Section IV.D, Cultural Resources, of this Draft EIR, to address potential Project impacts to historical resources, while Mitigation Measures CUL-MM-21 and CUL-MM-22 would address potential impacts on archaeological resources.

Mitigation Measures CUL-MM-1 through CUL-MM-20 require that prior to the commencement of demolition, relocation, or rehabilitation work, a qualified historic preservation professional be retained and the Project Site be documented in accordance

with Historic American Building Survey (HABS) guidelines. In addition, the Project shall include an interpretive program that informs the public about the history of the Radford Studio Center site. Mitigation Measures CUL-MM-4 through CUL-MM-20 specifically address the Mack Sennett Building, the Mill Building, the Arts/HR Building, the Telco Building, Building 3, Stage 9, Stage 10, Stage 2, and the Administration Building, including preparation of building-specific Historic Structure Reports and documentation of buildings in accordance with HABS guidelines.

Implementation of Mitigation Measures CUL-MM-1 through CUL-MM-20 would be beneficial in addressing the Project's potential impacts to historical resources and require any physical improvements, such as identified repairs and alterations to any of the historical buildings, be conducted in accordance with the Secretary of the Interior's Standards for Rehabilitation (Rehabilitation Standards). As such, any necessary improvements would not have the potential to result in significant impacts, and implementation of Mitigation Measures CUL-MM-1 through CUL-MM-20 would not result in adverse secondary impacts.

Mitigation Measure CUL-MM-21 requires that prior to the start of ground disturbance activities, a qualified archaeologist be retained to prepare a written Cultural Resource Monitoring and Treatment Plan to reduce potential Project effects on unanticipated archaeological resources unearthed during construction. The Cultural Resource Monitoring and Treatment Plan shall include monitoring protocols, provisions for evaluating and treating unanticipated archaeological materials discovered during ground-disturbing activities, and implementation of a Worker Environmental Awareness Program (WEAP) training program for construction workers involved in ground disturbance activities. Mitigation Measure CUL-MM-22 requires that prior to the start of ground disturbance activities, the principal archaeologist prepare and implement a written geoarchaeological testing plan within the area of direct impact where ground-disturbing activities extend more than 12 feet below the existing ground surface. These mitigation measure could potentially require targeted excavations to unearth additional archaeological resources, if such is the recommendation of the principal archaeologist. In addition, in the event that grading and excavation activities are temporarily diverted, construction activities could be delayed and the duration of construction could be extended. If the duration of construction is extended, the same construction activities evaluated throughout this Draft EIR would continue to occur. Extending the duration of construction would not result in new or increased activities not already evaluated in this Draft EIR. As such, extending the construction duration would not result in new or increased impacts related to cultural resources. Therefore, implementation of Mitigation Measures CUL-MM-1 through CUL-MM-22 would be beneficial in reducing Project impacts on cultural resources, if any, and would not result in significant adverse secondary impacts.

d. Geology and Soils

Mitigation Measure GEO-MM-1 is included in Section IV.F, Geology and Soils, of this Draft EIR, to address potential Project impacts on paleontological resources. This mitigation measure requires that a qualified paleontologist be retained prior to ground disturbance activities associated with the Project in order to develop a site-specific Paleontological Resource Mitigation and Treatment Plan that shall include monitoring of all ground disturbance activities within Pleistocene age older alluvial deposits or the Modelo Formation, and if potential resources are found, ground disturbance activities may be temporarily halted as directed by the paleontologist. This mitigation measure could potentially require excavations to unearth additional paleontological resources, if recommended by the paleontologist. In addition, in the event that grading and excavation activities are temporarily diverted due to the discovery of a paleontological resource, construction activities could be delayed and the duration of construction could be extended. If the duration of construction is extended, the same construction activities evaluated throughout this Draft EIR would continue to occur. Extending the duration of construction would not result in new or increased activities not already evaluated in this Draft EIR. As such, extending the construction duration would not result in new or increased impacts related to geology and soils, including paleontological resources. Therefore, implementation of Mitigation Measure GEO-MM-1 would be beneficial in reducing Project impacts on paleontological resources, if any, and would not result in significant adverse secondary impacts.

e. Hazards and Hazardous Materials

Section IV.H, Hazards and Hazardous Materials, of this Draft EIR, incudes Mitigation Measure HAZ-MM-1 to address potential hazards impacts during construction. Mitigation Measure HAZ-MM-1 provides for the implementation of a Soil Management Plan that includes protocols regarding precautions, observations, and evaluations of soil conditions to be implemented during ground disturbance activities. The protocols include precautions during earthwork activities within specified areas of the Project Site, implementation of a Health and Safety Plan, measures for sampling and stockpiling of suspect soils, compliance with regulations regarding the safety of construction workers, and provisions for below-grade structures, such as storm water infrastructure, that have the potential to be encountered during construction. Implementation of this mitigation measure would address impacts associated with the release of hazardous materials into the environment. These measures would be implemented in accordance with applicable regulatory requirements and regulatory oversight. As such, this mitigation measure would not include physical improvements that would result in adverse secondary impacts.

f. Noise

Mitigation Measures NOI-MM-1 and NOI-MM-2 are included in Section IV.K, Noise, of this Draft EIR, to address potential Project impacts related to construction noise. Mitigation Measures NOI-MM-1 and NOI-MM-2 require temporary and impermeable sound barriers to be installed during construction. In addition, at plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with these measures. The installation of the sound barriers would be part of the site preparation activities prior to commencement of construction. Any noise associated with this installation would not result in additional noise beyond what has already been disclosed in the discussion of construction noise impacts. Furthermore, the sound barrier would reduce the Project's noise impacts from construction, and the temporary sound barriers would be removed upon completion of construction. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

g. Tribal Cultural Resources

Mitigation Measure TCR-MM-1 is included in Section IV.N, Tribal Cultural Resources, of this Draft EIR, to address potential Project impacts on tribal cultural resources. Specifically, Mitigation Measure TCR-MM-1 requires that a tribal monitor be retained prior to the start of Project ground disturbance. The tribal monitor shall complete daily monitoring logs. Monitor logs shall identify and describe any discovered tribal cultural resources. Copies of monitor logs shall be provided weekly to the Department of City Planning. Upon discovery of any tribal cultural resource, all construction activities shall cease within a 25-foot radius of the find. If the find is determined to be a tribal cultural resource by the consulting tribe(s) and Department of City Planning, treatment recommendations shall be developed by the tribe(s) and Department of City Planning within 48 hours of the discovery. Construction activities may resume after the tribal cultural resource has been assessed and any required field treatment measures implemented. Tribal monitoring shall conclude upon either: (1) written notification to the consulting tribe(s) from the Department of City Planning or Applicant that all ground-disturbing activities and phases of work that may involve ground-disturbing activities at the Project Site are complete; or (2) written notification to the Department of City Planning from the consulting tribe(s) that no future, planned construction activities at the Project Site have potential to impact tribal cultural resources. Within 30 days of concluding tribal monitoring, the consulting tribes(s) shall prepare and submit to the Department of City Planning a letter summarizing the results of tribal monitoring and confirming that the field component of the tribal monitoring requirement of the tribal cultural resources mitigation measures has been fulfilled. Mitigation Measure TCR-MM-1 also requires that if Native American human remains are discovered at the Project Site, Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.9 be followed.

Mitigation Measure TCR-MM-1 could potentially delay and extend the duration of construction in the event that grading and excavation activities are temporarily diverted due to a find. As discussed above, if the duration of construction is extended, the same construction activities evaluated throughout this Draft EIR would continue to occur. Extending the duration of construction would not result in new or increased activities not already evaluated in this Draft EIR. As such, extending the construction duration would not result in new or increased impacts related to tribal cultural resources. Therefore, implementation of Mitigation Measure TCR-MM-1 would be beneficial in reducing Project impacts on tribal cultural resources, if any, and would not result in significant adverse secondary impacts.

6. Effects Not Found to Be Significant

CEQA Guidelines Section 15128 states that an EIR must 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 EIR. An Initial Study was prepared for the Project and is 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 of Los Angeles determined through the Initial Study that the Project would not have the potential to cause significant impacts related to aesthetics (damage scenic resources within a State scenic highway); agriculture and forestry resources; air quality (odors); biological resources (conflict with Habitat Conservation Plan); geology and soils (landslides, soil erosion, and soils incapable of supporting septic tanks); hazards and hazardous materials (airport or airstrip-related hazards, conflict with an emergency response plan or emergency evacuation plan, and wildland fires); hydrology and water quality (flood flows, inundation, conflict with water quality control plans or sustainable groundwater management plans); land use and planning (physical division of an established community); mineral resources; noise (airport or airstrip-related noise); population and housing; public services (schools, parks, libraries); recreation; transportation (hazards due to a geometric design feature and emergency access); utilities and service systems (conflict with solid waste management and reduction statutes); and wildfire. A summary of the analysis provided in Appendix A for these issue areas is provided below.

a. Aesthetics (Scenic Resources)

As detailed in the Initial Study and reiterated in Section IV.A, Aesthetics, of this Draft EIR, the Project Site is not located along or near a State scenic highway. Therefore, the Project would not substantially damage scenic resources within a State scenic highway as no scenic highways are located adjacent to the Project Site, and impacts would be less than significant.

b. Agriculture and Forestry Resources

The Project Site is located in an urbanized area of the City and is currently developed with studio uses and parking. The Project Site and surrounding area are not mapped for or zoned for agricultural or forest uses, and no agricultural or forest lands occur on-site or in the vicinity of the Project Site. Therefore, as concluded in the Initial Study, no impacts to agriculture and forestry resources would occur.

c. Air Quality (Odors)

As detailed in the Initial Study and reiterated in Section IV.B, Air Quality, of this Draft EIR, no objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people.

d. Biological Resources (Conflict with Habitat Conservation Plans)

As detailed in the Initial Study and reiterated in Section IV.C, Biological Resources, of this Draft EIR, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site. Thus, as determined in the Initial Study, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans, and no impact would occur.

e. Geology and Soils (Landslides; Soil Erosion; Soils Capable of Supporting Septic Tanks)

As detailed in the Initial Study and reiterated in Section IV.F, Geology and Soils, of this Draft EIR, the Project Site and surrounding area are fully developed, and the Project Site is generally characterized by relatively level topography. Additionally, the Project Site is not identified as within a landslide area as mapped by the State or City. As such, impacts regarding landslides would be less than significant.

Given the largely impervious (developed/paved) nature of the Project Site, there are limited landscaped areas with exposed topsoil. Additionally, all grading activities would comply with City requirements related to erosion control, including issuance of Los Angeles Department of Building and Safety (LADBS) grading permits, LAMC Chapter IX, Article 1 related to grading, and the City's Low Impact Development (LID) Ordinance. Therefore, as

determined in the Initial Study, with compliance with all applicable regulatory requirements, impacts regarding soil erosion or the loss of topsoil would be less than significant.

The Project Site is located within a community served by existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would have no impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems.

f. Hazards and Hazardous Materials (Airport or Airstrip-Related Hazards; Emergency Response Plan or Evacuation Plan; Wildland Fires)

As detailed in the Initial Study and reiterated in Section IV.H, Hazards and Hazardous Materials, of this Draft EIR, the Project Site is not located within two miles of an airport or within an airport planning area. Therefore, as concluded in the Initial Study, the Project would not have the potential to result in a safety hazard or excessive noise for people residing or working near an airport, and no impact would occur.

With regard to emergency response, the Applicant and construction contractor would comply with all instructions from LAFD and LAPD regarding evacuation requirements. In addition, while operation of the Project would generate vehicle trips in the Project Site vicinity and could result in some modifications to the Project Site's access, primarily related to expanding the number of access points to the Project Site, the Project would comply with LAFD access requirements and would not impede emergency access in the Project Site vicinity. Therefore, as evaluated in the Initial Study, the Project would not physically interfere with or impair the implementation of an emergency response plan or emergency evacuation plan, and impacts would be less than significant.

The Project Site is located in an urbanized area without wildlands in its vicinity. In addition, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone. Furthermore, the Project would be developed in accordance with all applicable LAMC requirements pertaining to fire safety. Therefore, the Project would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, and no impact would occur.

g. Hydrology and Water Quality (Flood Flows; Inundation; and Water Quality Control Plans or Sustainable Groundwater Management Plans)

As detailed in the Initial Study and reiterated in Section IV.I, Hydrology and Water Quality, of this Draft EIR, the Project Site is not located within a 100-year flood hazard area

as mapped by the Federal Emergency Management Agency (FEMA) or by the City and is not located in an area subject to tsunami or seiche. Thus, as concluded in the Initial Study, the Project would not impede or redirect flood flows or risk release of pollutants due to inundation, and no impacts would occur.

The implementation of BMPs required by the City's LID Ordinance would target any potential pollutants to minimize pollutant loads generated by the Project in stormwater runoff. Implementation of LID features as part of the Project could result in an improvement in surface water quality runoff as compared to existing conditions. As such, the Project would not introduce new pollutants or an increase in pollutants that would conflict with or obstruct any water quality control plans for the Los Angeles River Watershed. Therefore, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan, and impacts would be less than significant.

h. Land Use and Planning (Physical Division of an Established Community)

As detailed in the Initial Study and reiterated in Section IV.J, Land Use, of this Draft EIR, the Project Site is currently developed with Radford Studio Center and is located in an urbanized area that is developed with a diverse mix of land uses. The Project includes the continuation of the existing studio use and the redevelopment of portions of Radford Studio Center, which would be consistent with the existing on-site uses. Furthermore, the Project Site and vicinity are in a previously developed area, and the Project does not propose a freeway or other large infrastructure that could divide the existing surrounding community. Access to all surrounding properties would continue to be available upon buildout of the Project. Therefore, the Project would not physically divide an established community, and impacts related to the physical division of an established community would be less than significant.

i. Mineral Resources

No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone or Surface Mining District where significant mineral deposits are known to be present or within a mineral producing area as classified by the California Geologic Survey. The Project Site is also not located within a City designated oil drilling area. Therefore, as concluded in the Initial Study, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site, and no impact would occur.

j. Noise (Airport and Airstrip)

As detailed in the Initial Study and reiterated in Section IV.K, Noise, of this Draft EIR, the Project Site is not located within the vicinity of a private airstrip. In addition, the Project Site is not located within 2 miles of an airport or within an area subject to an airport land use plan. Given the distance between the Project Site and the closest private airstrip and public airport, the Project would not have the potential to expose people that reside or work in the Project area to excessive noise levels from these sources of noise. As concluded in the Initial Study, no impacts would occur.

k. Population and Housing

The Project does not include housing and, thus, would not directly introduce a new residential population that would contribute to population growth in the vicinity of the Project Site or in the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan area. Additionally, as no housing currently exists on the Project Site, the Project would not cause the displacement of any persons, housing, or require the construction of housing elsewhere. Therefore, no impacts related to displacement of people or housing would occur.

While construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized such that construction workers remain at a job site only for the time during which their specific skills are needed to complete a particular phase of the construction process. The Project would draw from the existing regional pool of construction workers who typically move from project to project as work is available. As such, Project-related construction workers would not be anticipated to relocate their household's permanent place of residence as a consequence of working on the Project and, therefore, no new permanent residents are expected to be generated during construction of the Project. Accordingly, Project construction would not induce substantial population growth.

With regard to permanent Project employment, as discussed in the Initial Study, and restated above, the Project's net increase in employment of 4,139 employees would represent approximately 8 percent of the employment growth forecasted in the City between 2023 and 2028, and, in the event buildout of the Project potentially extends to 2045, the Project's estimated 4,139 net new employees would constitute approximately 3.18 percent of the employment growth forecasted between 2023 and 2045. With regard to the total sound stage and production support floor area, under the land use exchange program, the Project's estimated 4,589 net new employees would constitute approximately 8.9 percent of the employment growth forecasted between 2023 and 2028. In the event buildout of the Project potentially extends to 2045, the estimated 4,589 net new employees would constitute approximately 3.5 percent of the employment growth forecasted between 2023 and 2045.

Based on the above, the Project would not induce substantial population growth either directly or indirectly. As concluded in the Initial Study, impacts would be less than significant.

l. Public Services (Schools; Parks; Libraries)

(1) Schools

As previously discussed, the Project does not include residential uses. Therefore, Project implementation would not result in a direct increase in the number of students within the LAUSD service area due to the introduction of a residential population. Regardless, per SB 50, the Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered full mitigation of Project-related school impacts. Therefore, as concluded in the Initial Study, impacts related to service ratios or other performance objectives for schools would be less than significant.

(2) Parks

As previously discussed, the Project would not include residential uses and would not generate a new residential population that would regularly utilize nearby parks and recreational facilities. In addition, while some new Project employees may be anticipated to relocate to the Project vicinity, many would not, nor would existing employees be expected to move as a result of redevelopment of the Project Site, and thus an associated demand for new or expanded park facilities would not be expected. Therefore, as concluded in the Initial Study, impacts related to park services would be less than significant.

(3) Libraries

As previously discussed, the Project would not include residential uses and would not generate a new residential population that would utilize local libraries. In addition, while some new Project employees may be anticipated to relocate to the Project vicinity, many would not, nor would existing employees be expected to move as a result of redevelopment of the Project Site, and thus an associated demand for new or expanded library facilities would not be expected. Therefore, as concluded in the Initial Study, impacts related to libraries would be less than significant.

m. Recreation

As discussed above, the Project would not generate a new residential population that would regularly utilize nearby parks and recreational facilities, and any use of local parks and recreational facilities is anticipated to be limited. Furthermore, the Project proposes on-site outdoor areas and may include fitness amenities for Project employees, thus reducing the

likelihood that employees would use local parks and recreational facilities. Lastly, the Project would not include recreational facilities available to the public. Any impacts related to the potential development of fitness amenities for Project employees has been evaluated as part of overall Project impacts. Therefore, as concluded in the Initial Study, impacts related to parks and recreational facilities would be less than significant.

n. Transportation (Hazards Due to a Geometric Design Feature; Emergency Access)

As detailed in the Initial Study and reiterated in Section IV.M, Transportation, of this Draft EIR, the Project Site is located in an urbanized area developed with numerous roadways and infrastructure. The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections. In addition, the Project would not include any new public roads that would result in an increase in hazards due to a design feature. In addition, the Project would not introduce any incompatible uses, as the proposed uses are consistent with the types of studio and related commercial uses already present onsite and in the vicinity. Thus, as concluded in the Initial Study, the Project's impact related to increased hazards due to a design feature or incompatible use would be less than significant.

With respect to emergency access, in the event of an emergency during construction of the Project, LAFD and LAPD would instruct businesses and residents of the area as to the specific evacuation plan as set forth in the City's General Plan Safety Element. The Applicant and construction contractor would comply with all instructions from LAFD and LAPD as to evacuation requirements. In addition, while operation of the Project would generate vehicle trips in the Project Site vicinity and could result in some modifications to the Project Site's access, the Project would comply with LAFD access requirements and would not impede emergency access in the Project Site vicinity. Therefore, as determined in the Initial Study, the Project would not result in inadequate emergency access, and impacts regarding emergency access would be less than significant.

o. Utilities and Service Systems (Solid Waste)

As detailed in the Initial Study and reiterated in Section IV.O.3, Utilities and Service Systems—Solid Waste, of this Draft EIR, the Project would be consistent with the applicable regulations associated with solid waste including, but not limited to, the City's Construction and Demolition Waste Recycling (Ordinance No. 181,519), City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), AB 939, AB 341, AB 1826, and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling, as well as the City's Curbside Recycling Program. Since the Project would comply with all applicable federal, state, and local management and reduction statutes and regulations related to solid waste, impacts would be less than significant.

p. Wildfire

The Project Site is located in an urbanized, generally flat area. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone. Therefore, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. As concluded in the Initial Study, no impacts regarding wildfire risks or related post-fire conditions would occur.