

# **I. Executive Summary**

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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 Radford Studio Center 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 CEQA Guidelines Section 15121, 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 CEQA Guidelines Section 15161. Furthermore, this Draft EIR complies with CEQA Guidelines Section 15064, 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 CEQA Guidelines Section 15128, 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 June 6, 2023, for a 30-day review period. In addition, a public scoping meeting for the Project was held on June 15, 2023. 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
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas 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
- Utilities and Service Systems (water supply, wastewater, solid waste, and energy infrastructure)

Additionally, the Initial Study determined the Project may have significant impacts related to aesthetics. However, Assembly Bill (AB) 2553, approved in September 2024, modified the definition of a major transit stop set forth in Public Resources Code (PRC) Section 21064.3 to mean a site containing an existing rail or bus rapid transit station, a ferry terminal served by either a bus or rail transit service, the intersection of two or more major bus routes with a frequency of service interval of 20 minutes or less during the morning and

afternoon peak commute periods, or other major transit stops that are included in the applicable regional transportation plan. With this updated legislation, the Project qualifies as an employment center project in a transit priority area pursuant to PRC Section 21099. As such, the Project is exempt from providing an analysis of aesthetics and aesthetics impacts associated with the Project are determined to be less than significant. Nonetheless, an analysis is provided in this Draft EIR for informational purposes only.

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. 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; biological resources; 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, Reduced Excavation/Grading Alternative; and Alternative 5, Residential Mixed-Use 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, NOP, and NOP Comment Letters
- Appendix B—Off-Site Improvements

- Appendix C—Aesthetics Appendix
  - Appendix C.1—Lighting Report
  - Appendix C.2—Shadow Study
  - Appendix C.3—Transit Priority Area Memorandum
- Appendix D—Air Quality and Greenhouse Gas Appendix
- Appendix E—Biological Resources Report
- Appendix F—Cultural Resources Appendix
  - Appendix F.1—Historical Resources Report
  - Appendix F.2—Archaeological Resources Assessment
- Appendix G—Energy Calculations
- Appendix H—Geology and Soils Appendix
  - Appendix H.1—Geotechnical Investigation
  - Appendix H.2—Dewatering Report
  - Appendix H.3—Paleontological Resources Report
- Appendix I—Hazards Appendix
  - Appendix I.1—Phase I ESA
  - Appendix I.2—Hazards Assessment
  - Appendix I.3—Subsurface Assessment
- Appendix J—Hydrology and Water Quality Report
- Appendix K—Land Use Tables
- Appendix L—Noise and Vibration Calculation Worksheets
- Appendix M—Utility Report
- Appendix N—LAPD Service Letter
- Appendix O—Transportation Appendix
  - Appendix O.1—Transportation Assessment

- Appendix O.2—LADOT Transportation Assessment Approval Letter
- Appendix O.3—LADOT Haul Route Approval Letter
- Appendix P—Tribal Cultural Resources Report
- Appendix Q—Water Supply Assessment
- Appendix R—Alternatives Appendix
  - Appendix R.1—Alternatives Transportation Memorandum
  - Appendix R.2—Alternatives Air Quality Calculations

## 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.”<sup>1</sup>

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

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<sup>1</sup> *City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, p. 3.*

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 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

The Project Site is currently improved with 1,179,110 square feet of studio-related uses, including 359,730 square feet of sound stages; 255,510 square feet of production support; 450,060 square feet of production office; and 113,810 square feet of general office.<sup>2</sup> The North and South Lots are currently improved with multiple buildings and internal access roads. These buildings include 21 sound stages, each ranging in size from approximately 7,000 square feet to approximately 25,000 square feet, as well as production support, production office, and general office uses. The Project Site also contains 52 permanent buildings/structures, various internal roads, basecamps, and outdoor areas. The existing buildings are primarily located at the northernmost point of the North Lot and throughout the entirety of the South Lot.

The existing Project Site supports a variety of media and production uses focused on the creation, development, recording, broadcasting, and editing of recorded and live television programming, live audience productions, feature films, and other audio, visual, and digital media. The activities related to these uses occur both indoors and outdoors within the Project Site. Specific uses and facilities on-site include motion picture, television, and broadcast studios, production activity areas; indoor and outdoor stages; sets and façades; digital, film, video, audio, video game, eSports, and media production areas; recording and broadcasting; sound labs; film editing; film, video, and audio processing areas; sets and props production areas (including spray booths); computer design and graphics; animation; and ancillary facilities related to those activities. Other related uses and facilities that also occur on-site include basecamps; communication facilities; conference facilities; modular/portable bungalows and trailers; studio support facilities; parking; catering facilities; a commissary; special events, audience, and entertainment shows; exhibit spaces; fitness facilities; emergency medical facilities to serve the on-site employees and visitors; emergency generators; above-ground and below-ground storage tanks; pads for utilities and transmission equipment; maintenance and storage facilities; mills/manufacturing facilities; sleeping quarters for on-site personnel; outdoor amenities; security facilities; carports; solar panels; and storage and warehouses.

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<sup>2</sup> See Section 4.b, Land Use Plan and Permitted Floor Area, in Section II, Project Description, of this Draft EIR for definitions.



The Project Site operates 24 hours a day, seven days a week. In addition, temporary and occasional special events, including production-related and non-production related events, such as premieres, charitable events, community events, commercial events, and non-commercial events, and other special events defined in Los Angeles Municipal Code (LAMC) Section 41.20.1(a), currently occur within the Project Site in accordance with the LAMC. These events generally require approval from the Los Angeles Department of Building and Safety (LADBS), Department of City Planning, Bureau of Street Services, Los Angeles Fire Department (LAFD), and Los Angeles Police Department (LAPD).

Outdoor production activity areas occur throughout the Project Site. These outdoor production activity areas are comprised of 1,045,000 square feet. Activities associated with these areas include, but are not limited to, setup and take down of sets and various outdoor filming activities and back lot production activities. These areas also provide flexible space for staging, connectivity between active production and supporting uses, housing of production vehicles, equipment storage, basecamps, and emergency vehicle access. Basecamps are contained within the outdoor production activity areas and are defined as areas that are at, near, or within a filming location, where critical production activities can be coordinated. These areas provide for production activities including, but not limited to, loading, wardrobe, hair, make-up, craft service, parking, and storage of mobile facilities or support vehicles. These existing basecamp activity areas, which comprise approximately 376,000 square feet, typically occur within existing parking areas and other outdoor areas.

As discussed in detail in Section IV.D, Cultural Resources, of this Draft EIR, the initial phase of development within the studio campus commenced in 1928 with construction of the Mack Sennett Studio. Since then, numerous buildings have been developed, and improvements have been made to accommodate a wider range of production uses that have evolved over time. The studio campus was used by various production companies until 1963, when CBS Television became the primary lessee, and later owner, of the studio campus.

Vehicular access to the Project Site is provided by five access points along Radford Avenue, one access point along Colfax Avenue (also known as the Colfax Gate), and two production access points along the alley just south of the Project Site.<sup>3</sup> Pedestrian access to the Project Site is also available at seven entrance points along Radford Avenue, at the Colfax Gate, and at one entrance point along the public alley south of the Project Site. A bridge that crosses the Los Angeles River provides internal vehicular and pedestrian access between the North Lot and South Lot of the Project Site.

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<sup>3</sup> *Access is limited for the two driveways along Radford Avenue north of the Los Angeles River and for the two production access points along the alley south of the Project Site.*

Existing automobile parking is located in multiple above-grade parking structures, which are accessible from both Radford Avenue and Colfax Avenue, as well as surface parking areas throughout the Project Site. A total of 3,095 vehicle spaces are currently provided on the Project Site.

All vehicular access and pedestrian entrances include secure, controlled access and a series of drive aisles that provide internal circulation throughout the Project Site. The public alley adjacent to the southern property line of the South Lot provides separation between the Project Site and the various commercial buildings to the south fronting Ventura Boulevard. The public alley contains numerous overhead power poles and lines with antiquated lighting and deteriorated paving.

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

In terms of topography, the Project Site generally slopes gently toward the direction of the Los Angeles River and Tujunga Wash. Project Site elevations range from approximately 585 to 617 feet AMSL. The majority of the North Lot slopes from its northwestern corner to its southeastern corner with approximately 15 feet of elevation change (from approximately 600 to 585 feet AMSL). The majority of the South Lot generally slopes both from its southwestern corner to its northwestern corner with approximately 27 feet of elevation change (from approximately 617 to 590 feet AMSL), and from its southwestern corner to its southeastern corner with approximately 17 feet of elevation change (from approximately 617 to 600 feet AMSL).

In coordination with Metro and other agencies, the City of Los Angeles Bureau of Engineering (BOE) has approved the future development of bikeway and greenway improvements along the Los Angeles River within the San Fernando Valley to connect gaps in the Valley River bikeway and to construct other improvements, such as pedestrian walking paths, decorative fencing and gates, roadway crossings, outdoor furnishings, lighting, operational and wayfinding signage, educational interpretive elements, Best Management Practices (BMPs) for stormwater runoff, landscaping, and irrigation.<sup>4</sup> Anticipated improvements within and in the immediate vicinity of the Project Site include bikeway improvements along Radford Avenue and the Tujunga Wash; a pedestrian/bicycle bridge over the Tujunga Wash; median plantings, undergrounding of utilities, sidewalk paving, and

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<sup>4</sup> *City of Los Angeles Interdepartmental Correspondence from Bureau of Engineering regarding Fiscal Year 2022-2023 Report for Los Angeles River Way–San Fernando Valley Completion, dated June 1, 2023.*

improvements to the existing Art Walk along Radford Avenue; fencing, solar lighting, signage, bio-swales, and plantings along the Tujunga Wash; and a new crosswalk and High-Intensity Activated crossWalk (HAWK) signal at Moorpark Street. BOE anticipates completion of these improvements by approximately 2030/2031.

## 6. Description of the Proposed Project

The Radford Studio Center Project (Project) would establish the Radford Studio Center Specific Plan (Specific Plan) to allow for the continuation of an existing studio use and the modernization and expansion of media production facilities within the approximately 55-acre Project Site. The Specific Plan would establish standards to regulate land use, massing, design, and development, and permit up to 2,200,000 square feet of sound stage, production support, production office, general office, and retail uses within the Project Site upon build out, as well as associated ingress/egress, circulation, parking, landscaping, and open space improvements. Specifically, the Specific Plan would permit up to 1,667,010 square feet of new floor area, the retention of 532,990 square feet of existing floor area, and the demolition of up to 646,120 square feet of existing floor area. In addition, the Radford Studio Center Sign District (Sign District) would also be established to permit studio-specific on-site signage. Upon completion, the Project would have a maximum Floor Area Ratio (FAR) of approximately 0.96:1.<sup>5</sup>

Proposed new buildings could range in height from approximately 60 feet to up to 135 feet above Project Grade.<sup>6</sup> Up to 6,050 vehicular parking spaces (including approximately 2,170 existing vehicular parking spaces to remain) would be provided at full buildout of the total floor area permitted under the proposed Specific Plan. As part of the Project, approximately 646,120 square feet of existing uses would be demolished and approximately 532,990 square feet of existing uses would remain.

Buildout under the proposed Specific Plan could take place in one or multiple phases and is anticipated to be completed as early as 2028 or as late as 2045.<sup>7</sup> The proposed Specific Plan would establish standards to regulate land use, massing, design, and development within the Project Site while allowing for adaptation to potential changes in technology or space requirements that are inherent to the pace of advancement in entertainment technology. Accordingly, as discussed in detail in Subsection 4.b.(1), below,

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<sup>5</sup> The Project's FAR is calculated as a ratio of the maximum floor area (as defined in Table II-1 below) to 2,276,215 square feet (the Project Site's area after dedications and mergers).

<sup>6</sup> Based on height measured from Project Grade, which is defined as 595 feet AMSL for the North Lot and 610 feet AMSL for the South Lot. Using the LAMC definition of building height, heights would range between approximately 60 feet and 140 feet.

<sup>7</sup> Construction of the proposed Radford Mobility Connector, extending from the northern terminus of Radford Avenue north across the Tujunga Wash to Moorpark Street, may be completed as early as 2028.

the proposed Specific Plan would allow for limited increases in sound stage and production support floor area in exchange for a corresponding reduction in floor area for other permitted uses, provided that the maximum permitted floor area of 2,200,000 square feet is not exceeded. The primary development regulations set forth in the proposed Specific Plan would address land use, design, historic regulations, childcare, alcohol sales, and parking, as well as associated implementation procedures. In addition, the proposed Sign District would be established to permit studio-specific on-site signage. Preliminary drafts of the proposed Specific Plan and Sign District are available on the Department of City Planning website.<sup>8</sup>

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 aesthetics, air quality, geology and soils, noise and vibration, and traffic. 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<sub>x</sub>); 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<sub>x</sub> 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 NO<sub>x</sub> would be significant and unavoidable under a long-term buildout scenario due to concurrent construction and operations.<sup>9</sup>

## 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

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<sup>8</sup> For informational purposes, the Draft Radford Studio Center Specific Plan Ordinance and Draft Radford Studio Center Sign District Ordinance are available on the Department of City Planning website. These are draft documents as submitted by the Applicant and are subject to change as they move through the entitlement process.

<sup>9</sup> 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.

interested parties on June 6, 2023, for a 30-day review period. In addition, a public scoping meeting for the Project was held on June 15, 2023. 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-13 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 with respect to regional construction-related emissions of NO<sub>x</sub>; 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<sub>x</sub> 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 NO<sub>x</sub> would be significant and unavoidable under a long-term buildout scenario due to concurrent construction and operations.<sup>10</sup>

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<sup>10</sup> 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.

**Table I-1  
Summary of Impacts Under the Project**

Environmental Issue	Project Impact
<b>A. AESTHETICS</b>	
Scenic Vistas	Less Than Significant
Conflict with Applicable Regulations Governing Scenic Quality	Less Than Significant
Light and Glare	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<b>B. AIR QUALITY</b>	
Conflicts with Plans	Less Than Significant with Mitigation
Regional Emissions	
<i>Construction</i>	<b>Significant and Unavoidable</b>
<i>Operation</i>	Less Than Significant
<i>Concurrent Construction and Operation</i>	<b>Significant and Unavoidable</b>
Localized Emissions	
<i>Construction</i>	Less Than Significant with Mitigation
<i>Operation</i>	Less Than Significant
Toxic Air Contaminants	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<b>C. BIOLOGICAL RESOURCES</b>	
Impacts to candidate, sensitive, or special status species identified in local or regional plans, policies, regulations or by the CDFW or USFWS	Less Than Significant with Mitigation
Riparian habitat/sensitive natural communities	No Impact
Impacts to State or Federally Protected Wetlands	Less Than Significant
Impacts to Wildlife Corridors	Less Than Significant
Impacts to local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance	Less Than Significant with Mitigation
<b>D. CULTURAL RESOURCES</b>	
Historical Resources	Less Than Significant with Mitigation
Archaeological Resources	Less Than Significant with Mitigation
Human Remains	Less Than Significant
<b>E. ENERGY</b>	
Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Conflict with Plans for Renewable Energy or Energy Efficiency	Less Than Significant

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

Environmental Issue	Project Impact
<b>F. GEOLOGY AND SOILS</b>	
Geologic Hazards	Less Than Significant
Paleontological Resources	Less Than Significant with Mitigation
<b>G. GREENHOUSE GAS EMISSIONS</b>	
Construction	Less Than Significant
Operation	Less Than Significant
<b>H. HAZARDS AND HAZARDOUS MATERIALS</b>	
Construction	Less Than Significant with Mitigation
Operation	Less Than Significant
<b>I. HYDROLOGY AND WATER QUALITY</b>	
Surface Water Hydrology	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Groundwater Quality	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Surface Water Hydrology	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Groundwater Hydrology	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<b>J. LAND USE AND PLANNING</b>	
Conflict with Land Use Plans	Less Than Significant
<b>K. NOISE</b>	
Construction	
<i>On-Site Noise</i>	<b>Significant and Unavoidable</b>
<i>Off-Site Noise</i>	<b>Significant and Unavoidable</b>
<i>On-Site Vibration (Building Damage)</i>	Less Than Significant
<i>On-Site Vibration (Human Annoyance)</i>	<b>Significant and Unavoidable</b>
<i>Off-Site Vibration (Building Damage)</i>	Less Than Significant
<i>Off-Site Vibration (Human Annoyance)</i>	<b>Significant and Unavoidable</b>
Operation	
<i>On-Site Noise</i>	Less Than Significant
<i>Off-Site Noise</i>	Less Than Significant
<i>Vibration</i>	Less Than Significant

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

<b>Environmental Issue</b>	<b>Project Impact</b>
<b>L. PUBLIC SERVICES</b>	
Fire Protection	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Police Protection	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<b>M. TRANSPORTATION</b>	
Conflict with Plans	
Vehicle Miles Traveled	
Freeway Safety Analysis	
<b>N. TRIBAL CULTURAL RESOURCES</b>	
Tribal Cultural Resources	
	Less Than Significant with Mitigation
<b>O. UTILITIES AND SERVICE SYSTEMS</b>	
Water Supply and Infrastructure	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Wastewater	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Solid Waste	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Electric Power, Natural Gas, and Telecommunications Infrastructure	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<hr/> <i>Source: Eyestone Environmental, 2025.</i>	

## 10. Project Design Features

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

### a. Aesthetics

**Project Design Feature AES-PDF-1:** Temporary 10-foot-tall, opaque construction fencing will be installed around construction sites that are visible from the adjacent public streets, Los Angeles River, and Tujunga Wash. Any



graffiti that may appear on this construction fencing will be removed on a regular basis.

**Project Design Feature AES-PDF-2:** Outdoor lighting will be directed away from adjacent residential properties and the public right-of-way. However, construction lighting will not be so limited as to compromise the safety of construction workers.

**Project Design Feature AES-PDF-3:** All landscaped areas will be maintained in accordance with an approved landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect.

**Project Design Feature AES-PDF-4:** Stationary light sources will be designed to produce no more than 0.74 fc of illumination as measured at the Project Site property line or at the centerline of the adjacent public right-of-way.

**Project Design Feature AES-PDF-5:** All exterior stationary lights located within 50 feet of the Project Site boundary<sup>11</sup> will not exceed 30 feet in height, will be fully shielded, and have a Backlight, Uplight, and Glare (BUG) rating of B=0 U=0 G=0 to reduce glare, uplight, and backlight onto the adjacent residential properties.

**Project Design Feature AES-PDF-6:** All exterior stationary lights located within 50 feet of the Project Site boundary will have a type II distribution.<sup>12</sup>

**Project Design Feature AES-PDF-7:** Parking structure rooftop lighting will not exceed 20 feet in mounting height and will use horizontally mounted, rectilinear-type, sharp cut-off fixtures shielded in such a manner that the source cannot be viewed from residentially zoned properties outside of the Project Site. The source will not exceed 9,500 lumens and will be located no less than 40 feet from the building perimeter and/or below the height of the roof parapet.

**Project Design Feature AES-PDF-8:** All exterior building and stationary site lighting will not exceed 2,500 lumens within 50 feet of the Project Site boundary. All exterior building and site lighting located beyond 50 feet of the Project Site boundary will not exceed 20,000 lumens.

**Project Design Feature AES-PDF-9:** Project signs located within 100 feet from Project property line and/or Project boundary will not exceed the nighttime luminance of 100 candelas per meter squared ( $\text{cd}/\text{m}^2$ ) at night from sunset until sunrise. Exterior Project signs will be illuminated by

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<sup>11</sup> Portions of the Los Angeles River and Tujunga Wash are contained within the eastern portion of the Project Site in dedicated easement areas. Thus, the Project Site property line includes these areas. The Project Site boundary is the internal edge where the Project components are developed that is adjacent to the Los Angeles River and Tujunga Wash easement areas.

<sup>12</sup> Distribution types are terms used to define the pattern of light disperse from a luminaire. The type II distribution is used for wide walkways, ramps, and any other long, narrow roadways. This type is meant for illuminating larger areas and is usually located adjacent to the roadside.

fully shielded light fixtures mounted at the top and bottom of the signs. Digital displays will not be permitted on the Project exterior (i.e., digital displays will only be permitted in the Site Interior).

**Project Design Feature AES-PDF-10:** Project signs located beyond 100 feet from the Project property line for the western and southern portion of the Project Site and the Project boundary for the eastern portion of the Project Site will not exceed the nighttime luminance of 300 cd/m<sup>2</sup> at night from sunset until sunrise. No interior digital Project signs will be allowed within 100 feet from the Project property line to the west and south and 100 feet from the Project boundary to the east and north.

**Project Design Feature AES-PDF-11:** Mural walls will be illuminated with fully shielded floodlights located at the top of the walls shining down. Mural/art walls surface brightness will not exceed 50 cd/m<sup>2</sup>.

**Project Design Feature AES-PDF-12:** Project signs will not exceed the daytime luminance of 6,000 cd/m<sup>2</sup> for all signs during the day, from 45 minutes after sunrise until 45 minutes prior to sunset.

**Project Design Feature AES-PDF-13:** Project signs luminance will transition smoothly from daytime luminance to nighttime luminance and vice versa over a period of no less than 45 minutes.

**Project Design Feature AES-PDF-14:** Illuminated signs that have the capacity to exceed the maximum luminance permitted at night (300 cd/m<sup>2</sup>) will include an electronic control system to reduce sign luminance to the maximum nighttime brightness (300 cd/m<sup>2</sup>) at any time when ambient sunlight is less than 100 fc.

**Project Design Feature AES-PDF-15:** For internally illuminated signs, the maximum allowed lighting power will not exceed the product of the illuminated sign area and 12 watts per square foot.

**Project Design Feature AES-PDF-16:** All outdoor Project signs will be controlled with a photocontrol in addition to an automatic time-switch control, or an astronomical time-switch control.

**Project Design Feature AES-PDF-17:** All outdoor signs that are illuminated at night and for more than 1 hour during daylight hours will be controlled with a dimmer that provides the ability to automatically reduce Project signs power by a minimum of 65 percent during nighttime hours.

**Project Design Feature AES-PDF-18:** The sign area facing the sensitive use property (motel use), which directly abuts the public alley to the south of the Project Site, will not exceed 270 square feet to comply with the Code-required 3 footcandle (fc) threshold. This limitation shall remain in place as long as the sensitive use (motel use) exists to the south of the Project. If the adjacent sensitive use is removed in the future, this Project design feature can be eliminated.

**Project Design Feature AES-PDF-19:** All lighting for above-grade parking structures and exterior building terraces will be designed to prevent light spill from any building or parking structure roof deck or terrace, or from any open elevations of any building or parking structure within 50 feet from the Project Site.

## b. Biological Resources

**Project Design Feature BIO-PDF-1 (Landscaping):** A qualified biologist will be retained to review the landscaping plan prior to submittal of the plan to the City to ensure that any landscaping component of the Project does not include the planting of exotic, invasive species that would potentially degrade the quality of the regional natural open space. A list of potential landscaping plant species will be submitted to the biologist for review prior to submittal of landscape plans to the City; the biologist will ensure that exotic plant species known to be invasive (e.g., those on the California Invasive Plant Council's [Cal-IPC's] invasive plant inventory) are not included on the list. The biologist will make recommendations for more suitable plant species if necessary. Once a final plant palette is prepared, landscaping installed in the development area will include only species on the approved palette.

**Project Design Feature BIO-PDF-2 (Migratory Bird Protection):** Pursuant to the provisions of the Migratory Bird Treaty Act (MBTA), this Project design feature provides the specific procedures that would be undertaken in the event an active bird nest is found. Specifically, if any active bird nest is found during a pre-construction nesting bird survey or is discovered inadvertently during earthwork or construction-related activities, a Qualified Biologist will be retained by the Applicant or Owner to determine an appropriate avoidance buffer, which will be no less than is necessary to protect the nest, eggs and/or fledglings, from damage or disturbance in consideration of the following factors: the bird species, the availability of suitable habitat within the immediate area, the proposed work activity, and existing disturbances associated with surrounding land uses. The buffer will be demarcated using bright orange construction fencing, flagging, construction lathe, or other means to mark the boundary of the buffer. All construction personnel will be notified of the buffer zone and will avoid entering the protected area. No Ground Disturbing Activities or vegetation removal will occur within this buffer area until the Qualified Biologist has confirmed that breeding/nesting is complete and the young have fledged the nest and/or that the nest is no longer an Active Nest. The Qualified Biologist will prepare a report prior to the issuance of any building permit detailing the results of the nesting bird survey and subsequent monitoring, which

will be maintained by the Applicant for at least five years after certificate of occupancy is issued.

### c. Cultural Resources

**Project Design Feature CUL-PDF-1:** The Mill Building will be relocated and rehabilitated in accordance with the Secretary of the Interior's Standards for Rehabilitation. The relocation and reassembly of the Mill Building will be conducted in a manner that preserves the historic base and facades and maintains its integrity so that it remains eligible for historic listing without implying a false historic condition or creating a false sense of historical development.

**Project Design Feature CUL-PDF-2:** Signs attached to the Stage 2 façades will be placed so as not obscure the rectangular form and curved bow-truss roof characteristic of Stage 2.

### d. 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 Geotechnical Engineering Evaluation 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 that 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 not 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 steel soldier piles, will be installed for excavation of the subterranean levels.

## e. Greenhouse Gas Emissions

**Project Design Feature GHG-PDF-1:** The Project will prohibit the use of natural gas during Project operations for new or renovated buildings, excluding food operations (e.g., restaurant/commissary uses).

## f. Hazards and Hazardous Materials

**Project Design Feature HAZ-PDF-1:** The Applicant will update, and the Project will comply with, the Spill Prevention, Control, and Countermeasure (SPCC) Plan for the Project Site. This will include spill prevention measures, such as 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 the 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 Applicant will update, and the Project will comply with, the Radford Studio Center 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 Applicant will update, and the Project will comply with, the Radford Studio Center Injury and Illness Prevention Program (IIPP), including the Radford Studio Center Safety Manual. The IIPP will include protocols regarding responsibility, compliance, employee communication, hazard assessment, accident/exposure investigation, hazard correction, training and construction, and recordkeeping. The Radford Studio Center Safety 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.

## g. Noise

**Project Design Feature NOI-PDF-1:** 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. The equipment screen will be impermeable (i.e., solid material with minimum weight of 2 pounds per square foot) and break the acoustic line-of-sight from the equipment to the off-site noise-sensitive receptors.

**Project Design Feature NOI-PDF-2:** Outdoor filming (“Exterior Shoots”) will not occur along the perimeter of the Project Site without prior notification of residents within a 500-foot radius of the property.

## h. Police Protection

**Project Design Feature POL-PDF-1:** During Project construction, the Applicant will implement temporary 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 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;
- Secured points of entry with 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
- Appropriate staff training on security protocols, including Project 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 secure routes 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 the 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 North Hollywood Division Commanding Officer that includes access routes and any additional information that might facilitate police response.

## i. 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 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 information and phone number to contact regarding inquiries and/or complaints, including 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 Radford Avenue, Ventura Boulevard, and Colfax Avenue, 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.
- 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 review and 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.

**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 existing 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 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:

- Education Programs/On-Site Coordinator: A coordinator will reach out to employees directly to promote the benefits of TDM. The coordinator would provide information on public transit and any related incentives, flexible work schedules and telecommuting programs, pedestrian and bicycle amenities provided, ride-share/carpool/vanpool programs, and parking incentives.



- Transportation Information Center/Kiosks via Mobility Hubs: The Project will install a transportation information center at the Mobility Hubs.<sup>13</sup> 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 Hubs, nearby transit stops, bicycle parking, and bikeshare facilities.
- Bicycle Amenities: In addition to the short-term and long-term bicycle parking spaces provided in accordance with the LAMC, the Project would also provide showers, lockers, and bicycle service areas and repair stands within the Project Site to facilitate bicycle use. The Project would incorporate features for bicyclists, such as exclusive access points and secured bicycle parking facilities. The Project Applicant would also contribute toward the implementation of bicycle improvements within the Study Area under 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 Radford Avenue, Colfax Avenue, and Moorpark Street, and maintain internal walkways throughout the Project Site. The Applicant will also contribute toward pedestrian facilities improvements as part of Vision Zero.
- 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 existing crosswalks at the signalized intersections in the Project area to current LADOT standards. As part of the Radford Bridge, the Project will provide public pedestrian and bicycle access from Moorpark Street to Ventura Boulevard via Radford Avenue, while prohibiting through access north and south along Radford Avenue

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<sup>13</sup> *The initial mobility hub would be located in the South Lot. Upon completion of the Radford Mobility Connector, a second mobility hub would be located in the North Lot.*

for vehicles. Access to the Los Angeles River and Tujunga Wash will also be enhanced.

- 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-thinking mobility solutions in the design and implementation of the Project and intends to provide support for such services at the Mobility Hubs. These services give employees a variety of travel mode choices and, therefore, encourage the use of non-automobile modes of transportation to and from the Project Site and reduce VMT.
- Carpool/Vanpool Parking and Loading via Mobility Hubs: The Mobility Hub(s) 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 within the Project Site at the Mobility Hubs.
- 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 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.

## j. Utilities and Service Systems—Water Supply and Infrastructure

**Project Design Feature WAT-PDF-1:** In addition to applicable regulatory requirements, the Project will incorporate the following water conservation features as set for in the Water Conservation Commitment Letter for the Project included as Appendix B of the WSA:

- ENERGY STAR—Certified Residential Dishwashers—standard with 3.0 gallons/cycle or less
- 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
- 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 shall 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. In addition, where commercially reasonable for the Project Site, construction equipment shall meet Tier 5 requirements.

To the extent commercially reasonable for the Project Site, small electric (i.e., less than 19 kilowatts) off-road equipment shall be used during Project construction in lieu of conventional small gasoline or diesel off-road equipment. Electric pumps shall be used for temporary dewatering during Project construction.

**Mitigation Measure AIR-MM-2:** During excavation activities for the South Lot, CARB verified soil stabilizers shall be used on unpaved haul roads. Unpaved haul roads shall also be covered with gravel with a maximum of five percent silt content. The on-site speed limit for construction employee vehicles and delivery and haul trucks shall be limited to 15 miles per hour (mph) on paved surfaces, 10 mph on unpaved surfaces controlled by soil stabilizers, and 5 mph near active work zones to position for loading/unloading.

**Mitigation Measure AIR-MM-3:** Construction haul truck staging areas shall be located on-site, as shown in Appendix D of the Draft EIR. In addition, where commercially reasonable for the Project Site, the Project's truck operator(s)/construction contractor(s) shall use 2014 model year or newer heavy-duty trucks meeting CARB's 2013 optional low-NO<sub>x</sub> standard (i.e., 0.02 grams per brake horsepower hour [g/bhp-hour] of NO<sub>x</sub> emissions).

**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.

**Mitigation Measure AIR-MM-5:** During Project operations, all landscaping equipment used on-site shall be electric powered.

## b. Biological Resources

**Mitigation Measure BIO-MM-1 (Bat Roost Avoidance and Impact Minimization):**

To avoid the direct loss of bats that could result from removal of trees and/or structures that may provide day or night roost habitat (e.g., in cavities or under loose bark), the following methods shall be implemented:

- a. Tree/structure removal activities shall be scheduled outside of the maternity roosting season for bats (October 1 and February 28) to avoid potential impacts to special-status bat species.
- b. No less than 15 days before scheduled tree/structure removal, a Qualified Biologist experienced with bat roost biology shall conduct a pre-construction reconnaissance survey to identify those trees and/or structures proposed for disturbance that could provide hibernacula, roosting, or nursery colony habitat for bats. If trees

and/or structures are removed outside the maternity season (March 1 to September 30), a Qualified Biologist experienced with bat roost biology shall conduct a follow up focused bat survey no less than 7 days before scheduled tree/structure removals. The surveys shall be conducted at dusk and after nightfall by a Qualified Biologist. Each tree and/or structure identified as potentially supporting an active maternity roost or day roost shall be closely inspected by the bat specialist to more precisely determine the presence or absence of roosting bats. If an active roost site is located during the survey, the roost shall be avoided, the tree and/or structure determined to be a maternity roost shall be left in place, and Project activities shall be conducted as recommended by the Qualified Biologist to avoid the area. A report shall be submitted to the City with the results of the survey and any needed maternity roost avoidance actions.

- c. To minimize disturbance to night roosts, tree removal activities shall not be conducted within 100 feet of bridges between 10:00 P.M. and sunrise at any time of year when work is conducted.
  - i. Bird exclusion netting shall not be used on underside of bridges.
  - ii. Lights shall not be used under bridges.
  - iii. Combustion equipment, such as generators, pumps, and vehicles, shall not be parked or operated under bridges.
  - iv. Personnel shall not be present under bridges from half an hour before sunset to half an hour after sunrise.
- d. If bats are not detected, but the Qualified Biologist determines that roosting bats may be present at any time of year, trees/structures that are to be demolished shall be slowly pushed down under the operator's control using heavy machinery rather than felling them with chainsaws. To ensure the optimum warning for any roosting bats that may still be present, the tree/structure shall be pushed lightly two to three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree shall then be pushed to the ground slowly and shall remain in place until it has been inspected by a qualified biologist. Trees that are observed to have bats during this process shall not be sawn up or mulched immediately. A period of at least 24 hours shall elapse prior to such operations to allow bats to escape. Bats shall be allowed to escape prior to demolition of trees/structures. This may be accomplished by placing one-way exclusionary devices into areas where bats are entering a building to allow them to exit but not enter the tree/structure.
- e. The Qualified Biologist shall document all demolition monitoring activities and prepare a summary report upon completion of tree disturbance and/or building demolition activities.

**Mitigation Measure BIO-MM-2 (Tree Protection):** Trees to be preserved on-site during the construction process shall have the following best management practices implemented to ensure their protection during construction:

- Prior to the initiation of construction activities, protective fencing shall be placed around the tree protection zone (at least 12 times the tree's trunk diameter-at-standard height) of all trees that are in the vicinity of the Project's construction and are intended to remain in place. No ground disturbance or storage of construction materials should occur within the tree protection zone during construction.
- A Certified Arborist shall be retained to monitor construction activities of any ground disturbance planned within the tree protection zone for any tree to be preserved during construction.

### c. Cultural Resources

**Mitigation Measure CUL-MM-1: Qualified Historic Preservation Professional.** A qualified historic preservation professional shall be retained to ensure that all rehabilitation, relocation, and alteration of historical resources located on the Radford Studio Center property, including the potential Mack Sennett Historic District and all its contributing buildings, the Mill Building, the Administration Building, and Stage 2 are conducted in accordance with the Secretary of the Interior's Standards for Rehabilitation to ensure that any alteration, rehabilitation, and/or relocation would protect the historic integrity of the historical resources. The historic preservation professional shall meet the Secretary of the Interior's Professional Qualifications Standards for historic architecture or architectural history with at least five years of demonstrated experience in the rehabilitation of historic buildings. The historic preservation professional shall review the construction drawings for compliance with the Standards. If the drawings do not meet the Standards, the historic preservation professional shall make recommendations for bringing them into compliance. The historic preservation professional shall ensure the notes on the drawings include procedures for unforeseen discoveries during construction. The historic preservation professional shall prepare a technical memorandum with findings, recommendations, and conclusions, which shall be submitted to the Los Angeles Office of Historic Resources (OHR) for review and concurrence. Building permits shall not be issued until the Los Angeles OHR has concurred the drawings comply with the Standards.

**Mitigation Measure CUL-MM-2: Documentation.** Prior to the commencement of demolition, relocation, or rehabilitation work, the Project Site shall be documented in accordance with Historic American Building Survey (HABS) guidelines. Level II documentation shall address the Project Site as a whole. One archival copy of the historic report in narrative format,

photographs, and negatives shall be donated to the HABS division of the National Parks Service for transmittal to the Library of Congress. Digital copies of the documentation shall be submitted to the Los Angeles OHR.

**Mitigation Measure CUL-MM-3: Interpretative Program.** The Project shall include an interpretive program that informs the public about the history of the Project Site. The program may be on- or off-site and could be a physical display, digital information, or a combination of the two. The concept for the program shall be submitted to the Los Angeles OHR for approval, prior to execution.

**Mitigation Measure CUL-MM-4: Mack Sennett Building Historic Structure Report.** A Historic Structure Report (HSR) shall be prepared for the Mack Sennett Building in accordance with Preservation Brief 43: The Preparation and Use of Historic Structure Reports. The HSR shall summarize the Mack Sennett Building's development history and historic significance; identify its character-defining features; document existing conditions; and describe recommended methods and treatments for its rehabilitation in conformance with the Secretary of the Interior's Standards. The HSR shall be submitted for review and approval by the Los Angeles OHR prior to the development of architectural or engineering plans.

**Mitigation Measure CUL-MM-5: Mack Sennett Building Documentation.** Prior to the commencement of rehabilitation or any related preparatory work, the Mack Sennett Building shall be documented according to HABS guidelines. Level II documentation shall include a historic report in narrative format. One archival copy of the historic report, photographs, and negatives shall be donated to the HABS division of the National Parks Service for transmittal to the Library of Congress. Digital copies of the documentation shall be submitted to the Los Angeles OHR.

**Mitigation Measure CUL-MM-6: Mack Sennett Building Standards Compliance.** The Mack Sennett Building shall be rehabilitated in accordance with the HSR and Secretary of the Interior's Standards for Rehabilitation. The rehabilitation plans shall be:

1. Created by a licensed architect meeting the Secretary of the Interior's Professional Qualifications Standards for historic architecture with at least five years of demonstrated experience in the rehabilitation of historic buildings.
2. Reviewed for compliance with the Rehabilitation Standards by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards for historic architecture or architectural history with at least five years of demonstrated experience in applying the Rehabilitation Standards to such projects.

- a. Reviewer shall create a technical memorandum at each phase (schematic, design and development, and construction documents) of the architectural design process. In the event the plans do not comply with the Rehabilitation Standards, the memorandum shall make recommendations for changes to bring them into compliance.
- b. Reviewer shall submit the memoranda to the Los Angeles OHR for concurrence that the plans comply with the Rehabilitation Standards prior to obtaining a building permit for the Mack Sennett Building.

Compliance with the Rehabilitation Standards shall be disclosed in the lease agreements, agreed upon in writing, and mutually enforced by the Applicant and the City. The tenants shall not be permitted to conduct work that does not comply with the Rehabilitation Standards.

**Mitigation Measure CUL-MM-7: Mill Building Historic Structure Report.** An HSR shall be prepared for the Mill Building in accordance with Preservation Brief 43: The Preparation and Use of Historic Structure Reports. The HSR shall summarize the Mill Building's development history and historic significance; identify its character-defining features; document existing conditions; and describe recommended methods and treatments for its relocation and rehabilitation in conformance with the Secretary of the Interior's Standards. The HSR shall be submitted for review and approval by the Los Angeles OHR prior to the development of architectural or engineering plans.

**Mitigation Measure CUL-MM-8: Mill Building Documentation.** Prior to the commencement of relocation and rehabilitation or any related preparatory work, the Mill Building shall be documented according to HABS guidelines. Level I documentation shall include a historic report in narrative format and measured drawings. One archival copy of the historic report, photographs, negatives, and drawings shall be donated to the HABS division of the National Parks Service for transmittal to the Library of Congress. Digital copies of the documentation shall be submitted to the Los Angeles OHR.

**Mitigation Measure CUL-MM-9: Mill Building Standards Compliance.** The Mill Building shall be relocated and rehabilitated in accordance with the HSR and Secretary of the Interior's Standards for Rehabilitation (Rehabilitation Standards). The relocation and rehabilitation plans shall be:

1. Created by a licensed architect meeting the Secretary of the Interior's Professional Qualifications Standards for historic architecture with at least five years of demonstrated experience in the rehabilitation of historic buildings.



2. Reviewed for compliance with the Rehabilitation Standards by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards for historic architecture or architectural history with at least five years of demonstrated experience in applying the Rehabilitation Standards to such projects.
  - a. Reviewer shall create a technical memorandum at each phase (schematic, design and development, and construction documents) of the architectural design process. In the event the plans do not comply with the Rehabilitation Standards, the memorandum shall make recommendations for changes to bring them into compliance.
  - b. Reviewer shall submit the memoranda to the Los Angeles OHR for concurrence that the plans comply with the Rehabilitation Standards prior to obtaining a building permit for the Mill Building.

**Mitigation Measure CUL-MM-10: Mill Building Interpretive Display.** The Project shall include an interpretive display to be located on-site at the Mill Building's new location. The interpretive display shall summarize the history and significance of the Mill Building and describe its original configuration and location prior to relocation.

**Mitigation Measure CUL-MM-11: Arts/HR Building Historic Structure Report.** An HSR shall be prepared for the Arts/HR Building in accordance with Preservation Brief 43: The Preparation and Use of Historic Structure Reports. The HSR shall summarize the Arts/HR Building's development history and historic significance; identify its character-defining features; document existing conditions; and describe recommended methods and treatments for its relocation and rehabilitation in conformance with the Secretary of the Interior's Standards. The HSR shall be submitted for review and approval by the Los Angeles OHR prior to the development of architectural or engineering plans.

**Mitigation Measure CUL-MM-12: Arts/HR Building Documentation.** Prior to the commencement of relocation and rehabilitation or any related preparatory work, the Arts/HR Building shall be documented according to HABS guidelines. Level II documentation shall include a historic report in short format. One archival copy of the historic report, photographs, and negatives shall be donated to the HABS division of the National Parks Service for transmittal to the Library of Congress. Digital copies of the documentation shall be submitted to the Los Angeles OHR.

**Mitigation Measure CUL-MM-13: Arts/HR Building Standards Compliance.** The Arts/HR Building shall be relocated and rehabilitated in accordance with the HSR and Secretary of the Interior's Rehabilitation Standards. The relocation and rehabilitation plans shall be:

1. Created by a licensed architect meeting the Secretary of the Interior's Professional Qualifications Standards for historic architecture with at least five years of demonstrated experience in the rehabilitation of historic buildings.
2. Reviewed for compliance with the Rehabilitation Standards by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards for historic architecture or architectural history with at least five years of demonstrated experience in applying the Rehabilitation Standards to such projects.
  - a. Reviewer shall create a technical memorandum at each phase (schematic, design and development, and construction documents) of the architectural design process. In the event the plans do not comply with the Rehabilitation Standards, the memorandum shall make recommendations for changes to bring them into compliance.
  - b. Reviewer shall submit the memoranda to the Los Angeles OHR for concurrence that the plans comply with the Rehabilitation Standards prior to obtaining a building permit for the Arts/HR Building.

**Mitigation Measure CUL-MM-14: Arts/HR Building Interpretive Display.** Develop an interpretive display to be located on-site at the Arts/HR Building's new location. The interpretive display shall summarize the history and significance of the Arts/HR Building and describe its original configuration and location prior to relocation.

**Mitigation Measure CUL-MM-15: Telco Building Documentation.** Prior to the commencement of demolition or any related preparatory work, the Telco Building shall be documented according to HABS guidelines. Level II documentation shall include a historic report in short format. One archival copy of the historic report, photographs, and negatives shall be donated to the HABS division of the National Parks Service for transmittal to the Library of Congress. Digital copies of the documentation shall be submitted to the Los Angeles OHR.

**Mitigation Measure CUL-MM-16: Building 3 Documentation.** Prior to the commencement of demolition or any related preparatory work, the Building 3 shall be documented according to HABS guidelines. Level II documentation shall include a historic report in short format. One archival copy of the historic report, photographs, and negatives shall be donated to the HABS division of the National Park Service for transmittal to the Library of Congress. Digital copies of the documentation shall be submitted to the Los Angeles OHR.

**Mitigation Measure CUL-MM-17: Stage 9 Standards Compliance.** Alterations to Stage 9 shall be conducted in accordance with the Secretary of the Interior's Rehabilitation Standards. The rehabilitation plans shall be:

1. Created by a licensed architect meeting the Secretary of the Interior's Professional Qualifications Standards for historic architecture with at least five years of demonstrated experience in the rehabilitation of historic buildings.
2. Reviewed for compliance with the Rehabilitation Standards by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards for historic architecture or architectural history with at least five years of demonstrated experience in applying the Rehabilitation Standards to such projects.
  - a. Reviewer shall create a technical memorandum at each phase (schematic, design and development, and construction documents) of the architectural design process. In the event the plans do not comply with the Rehabilitation Standards, the memorandum shall make recommendations for changes to bring them into compliance.
  - b. Reviewer shall submit the memoranda to the Los Angeles OHR for concurrence that the plans comply with the Rehabilitation Standards prior to obtaining a building permit for Stage 9.

**Mitigation Measure CUL-MM-18: Stage 10 Standards Compliance.** Repair and alterations to Stage 10 shall be conducted in accordance with the Secretary of the Interior's Rehabilitation Standards. The rehabilitation plans shall be:

1. Created by a licensed architect meeting the Secretary of the Interior's Professional Qualifications Standards for historic architecture with at least five years of demonstrated experience in the rehabilitation of historic buildings.
2. Reviewed for compliance with the Rehabilitation Standards by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards for historic architecture or architectural history with at least five years of demonstrated experience in applying the Rehabilitation Standards to such projects.
  - a. Reviewer shall create a technical memorandum at each phase (schematic, design and development, and construction documents) of the architectural design process. In the event the plans do not comply with the Rehabilitation Standards, the memorandum shall make recommendations for changes to bring them into compliance.

- b. Reviewer shall submit the memoranda to the Los Angeles OHR for concurrence that the plans comply with the Rehabilitation Standards prior to obtaining a building permit for Stage 10.

**Mitigation Measure CUL-MM-19: Stage 2 Standards Compliance.** Alterations to Stage 2 shall be conducted in accordance with the Secretary of the Interior's Rehabilitation Standards. The rehabilitation plans shall be:

1. Created by a licensed architect meeting the Secretary of the Interior's Professional Qualifications Standards for historic architecture with at least five years of demonstrated experience in the rehabilitation of historic buildings.
2. Reviewed for compliance with the Rehabilitation Standards by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards for historic architecture or architectural history with at least five years of demonstrated experience in applying the Rehabilitation Standards to such projects.
  - a. Reviewer shall create a technical memorandum at each phase (schematic, design and development, and construction documents) of the architectural design process. In the event the plans do not comply with the Rehabilitation Standards, the memorandum shall make recommendations for changes to bring them into compliance.
  - b. Reviewer shall submit the memoranda to the Los Angeles OHR for concurrence that the plans comply with the Rehabilitation Standards prior to obtaining a building permit for Stage 2.

**Mitigation Measure CUL-MM-20: Administration Building Standards Compliance.** Repairs and alterations to the Administration Building shall be conducted in accordance with the Secretary of the Interior's Rehabilitation Standards. The rehabilitation plans shall be:

1. Created by a licensed architect meeting the Secretary of the Interior's Professional Qualifications Standards for historic architecture with at least five years of demonstrated experience in the rehabilitation of historic buildings.
2. Reviewed for compliance with the Rehabilitation Standards by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards for historic architecture or architectural history with at least five years of demonstrated experience in applying the Rehabilitation Standards to such projects.
  - a. Reviewer shall create a technical memorandum at each phase (schematic, design and development, and construction documents) of the architectural design process. In the event the plans do not comply with the Rehabilitation Standards, the

memorandum shall make recommendations for changes to bring them into compliance.

- b. Reviewer shall submit the memoranda to the Los Angeles OHR for concurrence that the plans comply with the Rehabilitation Standards prior to obtaining a building permit for the Administration Building.

Compliance with the Rehabilitation Standards shall be disclosed in the lease agreements, agreed upon in writing, and mutually enforced by the Applicant and the City. The tenants shall not be permitted to conduct work that does not comply with the Rehabilitation Standards.

**Mitigation Measure CUL-MM-21: Qualified Archaeologist.** Prior to the start of ground disturbance activities during Project construction, the Applicant shall retain a Qualified Archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archeology to implement the Project cultural resource mitigation measures. Ground disturbance includes demolition, digging, trenching, plowing, drilling, tunneling, grading, leveling, clearing, auguring, striping of topsoil, or similar activities (Ground Disturbance Activities). A copy of the executed contract shall be submitted to the Department of City Planning prior to the issuance of any permit necessary for Ground Disturbance Activities.

Prior to the start of Ground Disturbance Activities, the principal archaeologist shall prepare and implement a written Cultural Resource Monitoring and Treatment Plan (CRMTP) to reduce potential Project effects on unanticipated archaeological resources unearthed during construction. The CRMTP shall include the professional qualifications required of key staff, applicable regulatory requirements, monitoring protocols, provisions for evaluating and treating archaeological materials discovered during Ground Disturbance Activities, situations under which monitoring may be reduced or discontinued, and reporting requirements. Applicable regulations shall include, but not be limited to, Public Resources Code (PRC) Section 5024.1; Title 14 California Code of Regulations, Section 15064.5 of the CEQA Guidelines; and PRC Sections 21083.2 and 21084.1. The monitoring protocols shall include, but not be limited to, halting Ground Disturbance Activities within at least a 25-foot radius (50-foot diameter) in the event resources are discovered so that the significance can be determined. Treatment provisions shall include, but not be limited to, the following: statement of the preference for preservation in place (i.e., avoidance) per CEQA Guidelines Section 15126.4(b)(3); description of methods for the adequate recovery of scientifically consequential information; requirements to coordinate with the Tribal Consultant(s) named in Mitigation Measure TCR-MM-1 to ensure that consideration is given to the cultural values ascribed to a resource beyond that which is scientifically important in the event the resource is Native American in origin; and procedures for curating any archaeological materials at a public, non-profit curation facility,

university, or museum with a research interest in the materials. The CRMTP shall be reviewed by the Applicant and the consulting Native American tribes identified by the City of Los Angeles and approved by the City of Los Angeles prior to commencement of any Ground Disturbance Activities.

Prior to the commencement of any Ground Disturbance Activities, the archaeological monitor 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 Qualified Archaeologist shall coordinate the proper implementation of this mitigation measure during the demolition and excavation phases of the Project. The archaeological and Native American monitor shall observe all Ground Disturbance Activities until the Qualified Archaeologist and Tribal Consultant(s), in consultation with the archaeological and Native American monitors, determine monitoring is no longer necessary, as specified in the CRMTP. If Ground Disturbance Activities are occurring simultaneously at multiple locations on the Project Site or off-site improvement areas, the Qualified Archaeologist shall determine if additional monitors are required for other locations where such simultaneous Ground Disturbance Activities are occurring.

Within 30 days of concluding the field component of the archaeological monitoring, the principal archaeologist shall prepare a cultural resources monitoring memorandum summarizing the results of any archaeological finds and stating that the field component of the archaeological monitoring requirement of the mitigation measure has been fulfilled. The cultural resources monitoring memorandum shall also summarize the results of the geoarchaeological testing required by Mitigation Measure CUL-MM-22 and further actions required to fulfill any outstanding requirements of the mitigation measures, including the preparation of a full technical report documenting the results of all cultural resources monitoring and geoarchaeological testing. In the event that archaeological resources are identified, a full technical report shall be prepared documenting the methods and results of all work completed under the CRMTP and Mitigation Measure CUL-MM-22, including, if any, treatment of archaeological materials, results of artifact processing, analysis, and research, and evaluation of the resource(s) for the

California Register of Historical Resources. The report shall be prepared under the supervision of the Qualified Archaeologist and submitted to the Department of City Planning within one year of completion of the monitoring, unless other arrangements are required given the nature of the discovery. The final report shall be submitted to the SCCIC.

**Mitigation Measure CUL-MM-22: Preparation of a Geoarchaeological Testing Plan.** Prior to the start of Ground Disturbance Activities, the principal archaeologist shall prepare and implement a written geoarchaeological testing plan (GTP) within the area of direct impact where ground-disturbing activities extend more than 12 feet below the existing ground surface. The GTP shall follow the methods and procedures used in the geoarchaeological testing reported herein. Although backhoe trenching and sample screening is the preferred testing method, alternative excavation strategies that allow for recovery of soil samples for screening and detailed recording of sediment stratigraphy may be used in lieu of trenching. The purpose of the GTP is to assess the archaeological sensitivity of portions of the area of direct impact below 12 feet of the existing ground surface.

Excavation of the top 12 feet of sediment within the area of direct impact has already been cleared through the first phase of testing reported herein and may proceed subject to the requirements of the CRMTP prepared in Mitigation Measure CUL-MM-21, above. Once grading of an area reaches 12 feet below the existing ground surface, grading must be halted in that area and the provisions of the GTP shall be applied to the next 12 feet of sediment. Grading may resume upon written notice to proceed from the principal archaeologist and with written concurrence of the Project proponent and lead agency. Grading shall continue in an iterative fashion with geoarchaeological testing being implemented for every 12 feet of vertical excavation until either the bottom depth of construction grading is reached or the principal archaeologist determines that grading has reached depths below which archaeological deposits are unlikely and that archaeological monitoring is sufficient for the identification and treatment of anticipated resources. The GTP may be suspended or stopped upon written notice from the principal archaeologist and with written concurrence of the Project proponent and the lead agency. Suspending or stopping the GTP does not affect the status of the provisions in the CRMTP. The results of geoarchaeological testing shall be fully reported in the cultural resources monitoring memorandum and report required in Mitigation Measure CUL-MM-21.

## d. Geology and Soils

**Mitigation Measure GEO-MM-1:** The services of a Qualified Professional Paleontologist, who meets Society of Vertebrate Paleontology (SVP) standards, 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. As defined by the SVP, a Qualified Professional Paleontologist, also Principal Investigator, or Project Paleontologist, is described as “a practicing scientist who is recognized in the paleontological community as a professional and can demonstrate familiarity and proficiency with paleontology in a stratigraphic context. A paleontological Principal Investigator shall have the equivalent of the following qualifications:

1. A graduate degree in paleontology or geology, and/or a publication record in peer reviewed journals; and demonstrated competence in field techniques, preparation, identification, curation, and reporting in the state or geologic province in which the project occurs. An advanced degree is less important than demonstrated competence and regional experience.
2. At least two full years professional experience as assistant to a Project Paleontologist with administration and project management experience; supported by a list of projects and referral contacts.
3. Proficiency in recognizing fossils in the field and determining their significance.
4. Expertise in local geology, stratigraphy, and biostratigraphy.
5. Experience collecting vertebrate fossils in the field.”

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. The Paleontological Resource Mitigation and Treatment Plan shall be reviewed by the curatorial staff of the Vertebrate Paleontology Section of the Natural History Museum of Los Angeles County. The Draft Paleontological Resource Mitigation and Treatment Plan shall be provided to the curatorial staff no later than four weeks before the start of excavation. A Worker Environmental Awareness Program (WEAP) shall be conducted at the preconstruction meeting for the Project.



The Qualified Professional Paleontologist shall supervise a Qualified Paleontological Resource Monitor, who shall monitor all ground disturbance activities within high sensitivity deposits (e.g., Pleistocene age alluvial deposits or the Modelo Formation), to identify potential paleontological resources. As defined by the SVP, a Qualified Paleontological Resource Monitor has the following qualifications (or their equivalent):

1. BS or BA degree in geology or paleontology and one year experience monitoring in the state or geologic province of the specific project. An associate degree and/or demonstrated experience showing ability to recognize fossils in a biostratigraphic context and recover vertebrate fossils in the field may be substituted for a degree. An undergraduate degree in geology or paleontology is preferable, but is less important than documented experience performing paleontological monitoring, or
2. AS or AA in geology, paleontology, or biology and demonstrated two years of experience collecting and salvaging fossil materials in the state or geologic province of the specific project, or
3. Enrollment in upper division classes pursuing a degree in the fields of geology or paleontology and two years of monitoring experience in the state or geologic province of the specific project.
4. Monitors must demonstrate proficiency in recognizing various types of fossils, in collection methods, and in other paleontological field techniques.

In the event of the discovery a paleontological resource, the monitor has the authority to divert and/or re-direct ground-disturbing activities in the area of the find and rope off a protective barrier of at least 50 feet to evaluate the unanticipated find.

If significantly disturbed deposits or younger deposits too recent to contain paleontological resources are encountered during construction, the Qualified Professional 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.

Post-construction, a report shall be prepared detailing paleontological resources discovered during construction. The paleontological resources shall be prepared, identified, curated, and donated to a repository, such as the Natural History Museum of Los Angeles County or the La Brea Tar Pits and Museum.

## e. Hazards and Hazardous Materials

**Mitigation Measure HAZ-MM-1:** Soil Management Plan (SMP)—The Applicant shall implement the SMP prepared by Geosyntec, provided as Attachment A of the Subsurface Assessment, 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 disturbed soils during Project earthwork activities in areas containing Chemicals of Concern (COCs) above screening levels (SLs). 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). 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. Any soil that is disturbed, excavated, or trenched due to onsite 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 their 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 Substances 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 onsite 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, including the preparation of a Project-specific HASP as noted above. 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 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 onsite personnel not to enter the fenced area. All soil shall be immediately loaded onto trucks for disposal to minimize stockpiling on-site. If soil needs to be temporarily stored on-site, the stockpiled soil shall be stored on the Project Site interior away from public interfaces on the perimeter.
- 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;

- Stormwater 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 onsite, 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 onsite construction workers shall be accomplished by the development and implementation of the HASP.

## f. Noise

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

- Along the western property line of the Project Site between the construction areas and the noise sensitive uses to the west, shielding receptor locations R1, R2, R3, and R4. The temporary sound barrier shall be designed to provide a minimum 20-dBA, 11-dBA, 20-dBA, and 5-dBA noise reduction at the ground level of receptor locations R1, R2, R3, and R4, respectively.
- Along the southern property line of the Project Site between the construction areas and the noise sensitive uses to the south, shielding receptor locations R5, R6, R7, and R8. The temporary sound barrier shall be designed to provide a minimum 5-dBA, 5-dBA, 7-dBA, and 20-dBA noise reduction at the ground level of receptor locations R5, R6, R7 and R8, respectively.
- Along the eastern boundary of the North Lot and South Lot between the construction areas and the noise sensitive uses to the east,

shielding receptor locations R9, R10, R11, and R12. The temporary sound barrier shall be designed to provide a minimum 13-dBA, 20-dBA, 5-dBA, and 18-dBA noise reduction at the ground level of receptor locations R9, R10, R11, and R12, respectively.

- Along the northern property line of the Project Site between the construction areas and the noise sensitive uses to the north, shielding receptor locations R13 and R14. The temporary sound barrier shall be designed to provide a minimum 18-dBA and 8-dBA noise reduction at the ground level of receptor locations R13 and R14, respectively.

**Mitigation Measure NOI-MM-2:** A temporary and impermeable sound barrier shall be erected at the locations listed below during off-site construction. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

- During the off-site construction along Radford Avenue, provide a temporary movable noise barrier between the construction equipment and the residences along the west side of Radford Avenue.<sup>14</sup> The temporary noise barrier shall be designed to provide a minimum 10-dBA noise reduction at the ground level of nearby residences west of Radford Avenue (receptor locations R1 through R4).
- During the off-site construction along the southern alley, along Carpenter Avenue (south of the Project Site), and along Colfax Avenue, provide a temporary movable noise barrier between the construction equipment and the multi-family residential use, school use, and hotel uses to the south (receptor locations R5, R6, and R8). The temporary noise barrier shall be designed to provide a minimum 10-dBA noise reduction at the at the ground level of receptor locations R5, R8, and R9, and 5-dBA noise reduction at receptor location R6.
- During the off-site Radford Bridge construction, provide a temporary movable noise barrier between the construction equipment and the residences to the south (receptor locations R1 and R2) and to the north (receptor locations R12 through R15). The temporary noise barrier shall be designed to provide a minimum 7-dBA, 5-dBA, 5-dBA, 10-dBA, 10-dBA, and 5-dBA noise reduction at the at the ground level of receptor locations R1, R2, R12, R13, R14, and R15, respectively.
- During the construction of the off-site Los Angeles Department of Water and Power Water Line Upgrades, provide a temporary

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<sup>14</sup> *The movable noise barrier would likely be on the public right-of-way. However, it may not be feasible at locations that block access to the residence's driveway.*

movable noise barrier between the construction equipment and the residences to the west (receptor locations R1 through R4), to the north (Receptors R13 and R14), to the south (Receptor R6), and the residences along Valleyheart Drive. The temporary noise barrier shall be designed to provide a minimum 10-dBA noise reduction at the ground level of receptor locations R1, R2, R3, R4, R13, R14, and residences along the south side of Valleyheart Drive, 6-dBA noise reduction at the residences along the north side of Valleyheart Drive (north of the Los Angeles River), and 5-dBA noise reduction the ground level of Receptor R6.

## **g. Tribal Cultural Resources**

**Mitigation Measure TCR-MM-1:** Prior to commencing any clearing, grubbing, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity (Ground Disturbance Activities) at the Project Site, the Applicant, or its successor, shall retain a tribal monitor(s) that is qualified to identify subsurface tribal cultural resources. Any qualified tribal monitor(s) shall be approved by the tribe they represent. Any qualified archaeological monitor(s), pursuant to Mitigation Measure CUL-MM-21, shall be approved by the Department of City Planning, Office of Historic Resources (OHR).

The qualified tribal monitor(s) shall observe all Ground Disturbance Activities on the Project Site at all times the Ground Disturbance Activities are taking place. If Ground Disturbance Activities are simultaneously occurring at multiple locations on the Project Site that cannot be reasonably monitored by one archaeological monitor and one tribal monitor, additional monitors shall be assigned as needed to ensure adequate coverage as determined by a qualified archaeologist, in consultation with the qualified tribal monitor(s).

On-site monitoring shall continue until written notice is received by the monitoring tribe(s) from the Applicant that all Ground Disturbance Activities that require tribal monitoring are complete. If Ground Disturbance Activities that require tribal monitoring are temporarily suspended, written notice of suspension shall be submitted to the tribe by the Applicant within one day of stopping work. The Applicant shall provide five days' written notice (if feasible) to the tribe prior to resuming any Ground Disturbance Activities that require monitoring. The on-site monitoring shall end when the Ground Disturbance Activities are completed, or when the archaeological and tribal monitor(s) both indicate that the specific area within the Project Site has a low potential for containing tribal cultural resources.

Prior to commencing any Ground Disturbance Activities, the archaeological monitor, in consultation with the tribal monitor(s), shall

provide Worker Environmental Awareness Program (WEAP) training to construction crews involved in Ground Disturbance Activities. As part of the WEAP training, construction crews shall be briefed on regulatory requirements for the protection of tribal cultural resources, and proper procedures to follow should a crew member discover tribal cultural resources during Ground Disturbance Activities. In addition, workers will be shown examples of the types of resources that would require notification of the archaeological monitor and tribal monitor(s). The Applicant shall maintain on the Project Site, for City inspection, documentation establishing the training was completed for all members of the construction crew involved in Ground Disturbance Activities.

In the event that any subsurface objects or artifacts that may be tribal cultural resources are encountered during the course of any Ground Disturbance Activities, all such activities shall temporarily cease within a 25-foot radius (50-foot diameter) of the area of discovery (“Discovery Area”). If a 25-foot radius is not possible due to Project Site constraints, a suitable and safe radius shall be determined by a qualified archaeologist, in consultation with the qualified tribal monitor(s), to ensure the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all Ground Disturbance Activities within the Discovery Area and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed Project; and (2) OHR.
2. If OHR determines, in their reasonable discretion and supported by substantial evidence pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be a tribal cultural resource, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant, or its successor, and the City regarding the monitoring of future Ground Disturbance Activities, as well as the treatment and disposition of any discovered tribal cultural resources. The City and/or Applicant shall, in good faith, consult with the monitoring tribe(s) on the disposition and treatment of any tribal cultural resource encountered during all Ground Disturbance Activities. If human remains or funerary objects are encountered during any Ground Disturbance Activities associated with the Project, such activities within a 50-foot radius (100-foot diameter) shall temporarily cease and the County Coroner shall be contacted pursuant to State Health and Safety Code Section 7050.5, and that code shall be enforced for the duration of the Ground Disturbance Activities. If a 50-foot radius is not possible due to Project Site constraints, a suitable and safe radius shall be determined by a

qualified archaeologist, in consultation with the qualified tribal monitor(s). The subsequent disposition of those discoveries shall be decided by the Most Likely Descendant (MLD), as determined by the Native American Heritage Commission (NAHC), should those findings be determined as Native American in origin.

3. The Applicant, or its successor, shall implement the tribe's recommendations if a qualified archaeologist retained by the City and paid for by the Applicant, or its successor, in consultation with the tribal monitor(s), reasonably conclude that the tribe's recommendations are reasonable and feasible.
4. In addition to any recommendations from the applicable tribe(s), a qualified archaeologist shall develop a list of reasonable actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the NAHC and in compliance with any applicable federal, state or local law, rule or regulation.
5. If the Applicant, or its successor, does not accept a particular recommendation determined to be reasonable by the qualified archaeologist and qualified tribal monitor(s), the Applicant, or its successor, may request mediation by a mediator agreed to by the Applicant, or its successor, and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require that the recommendation be implemented as originally proposed by the archaeologist and tribal monitor(s); (2) require that the recommendation, as modified by the City, be implemented, provided that the modified recommendation is at least equally as effective to mitigate a potentially significant impact to a tribal cultural resource; (3) require that a substitute recommendation be implemented, provided that the substitute recommendation is at least equally as effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require that the recommendation be implemented because it is not necessary to mitigate a potentially significant impact to a tribal cultural resource. The Applicant, or its successor, shall pay all costs and fees associated with the mediation.
6. The Applicant, or its successor, may recommence Ground Disturbance Activities outside of the Discovery Area, so long as this radius has been reviewed by both the qualified archaeologist and qualified tribal monitor(s) and determined to be reasonable and appropriate.



7. The Applicant, or its successor, may recommence Ground Disturbance Activities inside of the Discovery Area only after it has complied with paragraphs 2 through 5 above.
8. Copies of any tribal cultural resources study or report, detailing the nature of tribal cultural resources, remedial actions taken, and disposition of tribal cultural resources resulting from MM-TCR-1 shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the NAHC for inclusion in its Sacred Lands File.
9. Notwithstanding paragraph 8 above, any information that the Department of City Planning, in consultation with the City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code, Section 6254(r), and handled in compliance with the City's AB 52 Confidentiality Protocols.

## 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, Reduced Excavation/Grading Alternative; and Alternative 5, Residential Mixed-Use 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 above-grade parking structures, would remain on the Project Site, and no new construction would occur beyond ongoing production activities.

Alternative 1 would avoid the Project's significant and unavoidable impacts with respect to Project-level and cumulative regional construction-related emissions of NO<sub>x</sub>, on- and off-site noise during construction, and on-site vibration during construction (based on the significance threshold for human annoyance). Alternative 1 would also avoid the Project's significant and unavoidable Project-level impact with respect to off-site vibration

during construction. In addition, Alternative 1 would avoid the Project's impacts that were determined to be less than significant with mitigation, including those related to localized air quality emissions during construction, biological resources, cultural resources, paleontological resources, hazards and hazardous materials, and tribal cultural resources. Impacts associated with the remaining environmental issues also would generally be less when compared to Project's less-than-significant impacts.

## **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. Under Alternative 2, new development would occur within the South Lot, and building heights would be increased within certain areas of the South Lot. Alternative 2 would include the construction of an estimated 1,820,875 square feet of new development, the demolition of 599,985 square feet of existing studio-related uses, and the retention of an estimated 579,125 square feet of existing studio-related uses. Thus, upon completion of construction, Alternative 2 would include a total of 2,400,000 square feet of development with a floor area ratio (FAR) of approximately 1.24:1. The 2,400,000 square feet would be comprised of 450,000 square feet of sound stages, 360,000 square feet of production support uses, 840,000 square feet of production office uses, 720,000 square feet of general office uses, and 30,000 square feet of retail uses. Approximately 6,050 parking spaces would be provided. In addition, Alternative 2 would result in approximately 896,000 cubic yards of cut and 49,000 cubic yards of fill, resulting in approximately 847,000 cubic yards of export.

Alternative 2 would not avoid the Project's significant and unavoidable impacts with respect to regional construction-related emissions of NO<sub>x</sub>, and such impacts would be similar to those of the Project. Additionally, Alternative 2 would not substantially reduce or avoid the Project's significant and unavoidable cumulative regional construction-related NO<sub>x</sub> emissions. With the increase in vehicle trips, Alternative 2 would result in an increase in the extent of the significant and unavoidable impacts associated with Project operation and potential concurrent construction and operational activities. Alternative 2 would also result in a new significant impact associated with VOCs during operation that would not result from the Project.

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

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

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

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

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

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

### **c. Alternative 3: Reduced Density Alternative**

Alternative 3 would involve a 25-percent reduction in the Project's proposed development program set forth in Section II, Project Description, of this Draft EIR. Alternative 3 would include a site plan that would be similar to that of the Project but with reduced grading and reduced building heights within certain areas of the Project Site. Alternative 3 would involve the construction of an estimated 1,179,110 square feet of new development, the demolition of 595,049 square feet of existing studio-related uses, and the retention of an estimated 584,061 square feet of existing studio-related uses. Upon completion, Alternative 3 would include a total of 1,650,000 square feet of development with a resulting FAR of approximately 0.85:1. The total of 1,650,000 square feet of floor area would be comprised

of 340,000 square feet of sound stage, 240,000 square feet of production support uses, 540,000 square feet of production office uses, 515,000 square feet of general office uses, and 15,000 square feet of retail uses. Approximately 4,525 parking spaces would be provided under Alternative 3. In addition, under Alternative 3, approximately 605,000 cubic yards of cut, and approximately 55,000 cubic yards of fill would occur, resulting in the export of approximately 550,000 cubic yards of export.

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

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

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

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

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

Alternative 3 would reduce several of the less-than-significant impacts associated with the Project, including those related to the following: regional and localized emissions (operation); TACs; human remains; energy; GHG emissions; hazards and hazardous materials (operation); surface water quality; groundwater quality (construction); groundwater hydrology (construction); surface water hydrology (construction); noise (operation); vibration

(operation); fire protection; police protection; conflicts with transportation plans; freeway safety; water supply and infrastructure; wastewater; solid waste; and electricity, natural gas, and telecommunications infrastructure.

#### **d. Alternative 4: Reduced Excavation/Grading Alternative**

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

Alternative 4 would not avoid the Project's significant and unavoidable Project-level and cumulative impacts with respect to regional emissions of NO<sub>x</sub> during construction; however, such impacts would be less than those of the Project due to the reduction in the cut/export of soils under Alternative 4. In addition, with the reduction in the export of soils under Alternative 4, this alternative would reduce, but not eliminate, the Project's significant and unavoidable regional NO<sub>x</sub> impacts associated with potential concurrent construction and operational activities.

With regard to construction noise and vibration, Alternative 4 would reduce the Project-level and cumulative impacts associated with off-site noise during construction. However, impacts would remain significant and unavoidable. Construction-related impacts associated with on-site construction and on- (Project-level and cumulative) and off-site (Project-level) vibration related to human annoyance would be similar to the Project and would continue to be significant and unavoidable.

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

Alternative 4 would result in similar impacts associated with the following environmental topics, where the Project's impacts were concluded to be less than significant

after mitigation: biological resources (special status species and conflicts with plans) and historical resources.

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

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

### **e. Alternative 5: Residential Mixed-Use Alternative**

Alternative 5 would involve a mixed-use development with studio, residential, office, and commercial uses. Alternative 5 would include the construction of 1,934,875 square feet of new development, the demolition of 646,120 square feet of existing studio-related uses, and the retention of 532,990 square feet of existing studio-related uses. Upon completion, Alternative 5 would provide a total of 2,514,000 square feet of development, resulting in an FAR of approximately 1.29:1. Total development upon completion would be comprised of 750,000 square feet of residential uses (743 units), 379,000 square feet of sound stages, 300,000 square feet of production support uses, 575,000 square feet of production office uses, 450,000 square feet of general office uses, and 60,000 square feet of retail uses. Alternative 5 would permit maximum building heights up to 150 feet, which is greater than the Project. Under Alternative 5, a total of approximately 5,856 vehicular parking spaces would be provided at full buildout. Alternative 5 would result in approximately 605,000 cubic yards of cut and approximately 55,000 cubic yards of fill, resulting in approximately 550,000 cubic yards of export.

Alternative 5 would not avoid the Project's significant and unavoidable project and cumulative impacts with respect to regional emissions of NO<sub>x</sub> during construction; however, such impacts would be less than those of the Project due to the reduction in the export of soils during construction. With the addition of residential uses and increased floor area,

Alternative 5 would result in a new impact during operation of the Project associated with regional VOC emissions. This new impact together with the Project's NO<sub>x</sub> impact would also occur during overlap of construction and operational activities. Thus, Alternative 5 would increase the extent of the significant and unavoidable impacts associated with potential concurrent construction and operational activities.

With regard to construction noise, Alternative 5 would reduce the Project-level and cumulative impacts associated with off-site noise during construction. However, impacts would remain significant and unavoidable. In addition, impacts associated with on-site construction and on- (Project-level and cumulative) and off-site (Project-level) vibration (human annoyance) during construction would be similar to those of the Project and would be significant and unavoidable.

Alternative 5 would reduce some of the Project's impacts that would be less than significant after mitigation, including localized emissions (construction), biological resources (special status species and conflicts with plans), archaeological resources, paleontological resources, hazards and hazardous materials (construction), and tribal cultural resources. Alternative 5 would also result in similar less-than-significant impacts after mitigation as the Project with regard to historical resources.

Alternative 5 would result in similar impacts to the Project associated with the following environmental topics, where the Project's impacts were concluded to be less than significant: TACs (construction); biological resources (protected wetlands); geologic hazards; GHG emissions (construction); surface water hydrology; surface water quality (construction); groundwater quality; groundwater hydrology (operation); on-site noise (operation); on-site and off-site vibration (based on the significance threshold for building damage) (construction); vibration (operation); transportation (consistency with transportation plans, programs, and policies); and wastewater (construction).

Alternative 5 would result in greater (but less than significant) impacts associated with the following environmental topics, where the Project's impacts were concluded to be less than significant: localized emissions (operation); TACs (operation); energy (consumption of energy) (construction); GHG emissions (operation); hazards and hazardous materials (operation); surface water quality (operation); land use and planning; off-site noise (operation); fire protection and police protection (construction and operation); transportation (VMT and freeway safety); water supply and infrastructure (operation); wastewater (operation); solid waste (construction); and electric power, natural gas, and telecommunications infrastructure.

Alternative 5 would result in less-than-significant impacts related to biological resources (wildlife movement); human remains; groundwater hydrology; water supply and

infrastructure (construction); and solid waste (operation), that would be less when compared to the Project's less-than-significant impacts.

## **f. Environmentally Superior Alternative**

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

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

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

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives demonstrates that Alternative 4, the Reduced Excavation/Grading Alternative, would be the Environmentally Superior Alternative. Although Alternative 4 would not avoid the Project's significant and unavoidable impacts associated with regional emissions during construction, Alternative 4 would result in the greatest level of reduction in regional NO<sub>x</sub> emissions when compared with the other alternatives. As such, Alternative 4 would also reduce the Project-level and cumulative air quality impacts related to concurrent construction and operations. With the substantial reduction in daily haul truck trips, Alternative 4 would also substantially reduce the Project's off-site construction noise impact, although the impact would remain significant and unavoidable.

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



(construction), and tribal cultural resources. Alternative 4 would also result in less-than-significant impacts related to TACs (construction), human remains, GHG emissions (construction), surface water quality and hydrology (construction), groundwater quality and hydrology (construction), fire protection and police protection (construction), water supply (construction), and energy (construction) that would be less when compared to the Project's less-than-significant impacts.

The only impact area where Alternative 4 would result in greater impacts than the Project is related to aesthetics. Impacts would be greater due to the increase in building heights, but would remain less than significant. Impacts associated with all other environmental topics would be similar to the Project.

Alternative 4 would also still meet the underlying purpose of the Project, which is to maintain Radford Studio Center as a studio and to modernize and enhance production facilities within the Project Site to accommodate both the existing unmet and anticipated future demands of the entertainment industry, keep production activities and jobs in Los Angeles, upgrade utility and technology infrastructure, and create a cohesive studio lot. Additionally, as discussed above, while Alternative 4 would be the Environmentally Superior Alternative, it would not meet all of the Project objectives to the same extent of the Project.