# I. Executive Summary

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## 1. Introduction

In accordance with Sections 15088, 15089, and 15132 of the State Guidelines for the Implementation of the California Environmental Quality Act (CEQA Guidelines), the City of Los Angeles, as Lead Agency, has prepared this Final Environmental Impact Report (Final EIR) for the Sunset Bronson Studios Entertainment Center (Proposed Project).

As described in Sections 15089 and 15132 of the CEQA Guidelines, a lead agency must prepare a Final EIR before approving a project. The purpose of a Final EIR is to provide an opportunity for the lead agency to respond to comments made by the public and agencies regarding the Draft EIR. Pursuant to CEQA Guidelines Section 15132, this Final EIR includes a revised summary, corrections and additions to the Draft EIR, a list of persons, organizations, and agencies that provided comments on the Draft EIR, responses to comments received regarding the Draft EIR, and a Mitigation Monitoring and Reporting Program.

This Final EIR comprises the second part of the EIR for the Proposed Project and is intended to be a companion to the Draft EIR. The Draft EIR for the Proposed Project, circulated for public review and comment from March 7, 2013, through April 22, 2013, comprises the first part of the EIR and is incorporated by reference and bound separately. (Refer to Volumes I through V of the Draft EIR). This Final EIR is organized into four main sections as follows:

**Section I. Executive Summary**—This section provides an overview of the Proposed Project and its potential impacts. Also included in this section are areas of controversy and issues to be resolved, an overview of the public review process that was completed for the Proposed Project, and a summary of the alternatives to the Proposed Project.

**Section II. Corrections and Additions to the Draft EIR**—This section provides a list of revisions that have been made to the Draft EIR, based on comments received from the public and agencies, and other items requiring updating and/or corrections.

**Section III. Responses to Comments**—This section presents a matrix of the parties that commented on the Draft EIR and the issues that they raised. This matrix is followed by responses to each of the written comments made regarding the Draft EIR. Copies of the original comment letters are provided in Appendix A of this Final EIR.

**Section IV. Mitigation Monitoring and Reporting Program (MMRP)**—This section provides the full MMRP for the Proposed Project. The MMRP lists code compliance measures, project design features, and mitigation measures by environmental topic, and identifies for each of the measures and features the applicable enforcement agency, monitoring agency, monitoring phase, monitoring frequency, and action indicating compliance.

In addition, Appendix FEIR-A, Draft EIR Comment Letters is included as part of this Final EIR. This appendix to the Final EIR includes copies of all written comments received on the Draft EIR.

# 2. Overview of the Proposed Project

## A. Proposed Project

The Proposed Project involves the development of a 14-story office building and five-story production office building, supported by a proposed primarily seven-story parking structure that would include two levels of subterranean parking. One level of subterranean parking also would be provided below the proposed office building. In addition, the Proposed Project would include a replacement guard station along Van Ness Avenue, an outdoor seating area and café adjacent to the proposed production office building, and landscaping. When accounting for the existing on-site uses to be removed, the Proposed Project would result in the addition of approximately 391,018 square feet of net new building area within the Project Site.

## B. Proposed Design Revisions

Subsequent to the release of the Draft EIR, the Applicant revised the conceptual site plans for the Proposed Project to provide for an enhanced office building and parking structure design. These design changes are illustrated in Revised Figures IV.A-3 through IV.A-5 and Revised Figure IV.A-13 in Section II, Corrections and Additions to the Draft EIR, of this Final EIR. As shown therein, the façade of the office building has been modified to include groupings of floors that are horizontally offset from each other and feature alternating façades of glass curtain wall and panelized, precast concrete. This distinctive form reduces the scale of the office building into smaller elements further integrating the

office building into the overall Sunset Bronson Studios (SBS) campus and surrounding area. Specifically, as depicted in the revised figures provided in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, the first offset of the office building would occur at the elevation of the existing adjacent historic Executive Office Building (EOB), aligning with its eave line and establishing a complimentary scale relationship. The second offset would occur close to the top of the proposed parking structure. The top volume of the office building would be of a smaller footprint compared to the bottom portion of the building and would create a unique profile on the skyline. In addition, a roof terrace area for tenants would be provided within the second and fourth offsets. The office building also would continue to be set back from Sunset Boulevard to align with the façade of the EOB, allowing the detailed, articulated façade of the historic EOB to be visible and prominent. Low landscaping and free-standing columns atop a decorative base that would also continue to be implemented would further enhance the continuity between the historic colonnade and the old masonry fence line at the pedestrian level. It is further noted that the storefront on the first floor of the proposed office building would be glazed only along Van Ness Avenue while including punched window openings along Sunset Boulevard. Additionally, the height of the penthouse level was reduced to the same height as the common floors thereby creating an additional floor. Therefore, while the office building is now 14 stories, the height of 200 feet, as evaluated in the Draft EIR, has been preserved.

As illustrated in the revised figures included in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, the façade of the parking structure has also been enhanced to include decorative screening elements that provide articulation and visual interest. For example, the northeast corner of the parking structure would feature glazed elements that serve as a marquee identifying the studio entrance. In addition, the long façade of the parking structure would be punctuated by graphic screens with printed content that may feature shows filming on-site, the identity of prominent tenants such as KTLA 5, or artistic and historical images conveying the legacy of the long-standing studio. Further, in response to comments received regarding the number of levels within the proposed parking structure, it is noted that while the proposed parking structure is primarily seven stories, due to the slope of the Project Site, there is a small portion of one of the levels that daylights at eight levels along the southern portion of the parking structure. Additionally, the top of the decks that appears as an additional level is a platform that supports an array of satellite dishes above. This detailed description of the proposed parking structure design and height remains consistent with the overall design and height evaluated in the Draft EIR.

The following describes in greater detail each of the Proposed Project's key features. These descriptions incorporate the proposed design changes as provided above. As described in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, the proposed design modifications would not result in any new significant impacts or a substantial increase in an impact already identified in the Draft EIR.

### (a) Office Building

The proposed office building is anticipated to be located within the northeast corner of the Project Site. The top floor of the office building would reach a building height of approximately 200 feet. The office building would be of a contemporary design that would feature a distinctive glass and concrete panel façade. This façade would use energy efficient glass to bring natural light into the building, as well as to reduce energy demands and reduce glare. The energy efficient glass would be a part of the Proposed Project's energy-efficient design, which would target LEED Silver certification. The office building would include approximately 314,495 square feet of building area, and most of the office building's 14 floors would be designed to provide approximately 25,000 square feet of flexible leasable space. The penthouse floor would offer access to exterior terraces. Pedestrian access to the office building would be provided through a pedestrian-friendly landscaped plaza entrance on Van Ness Avenue. One level of subterranean parking would be provided below the office building.

### (b) Production Office Building

The five-story production office building is anticipated to be located near the center of the Project Site. The production office building would have a maximum building height of approximately 73 feet. The production office building would be located immediately adjacent to the west side of the proposed parking structure, creating the visual appearance of a single building with a production office component and a parking component. The proposed production office building would be positioned to take advantage of its location in the heart of the SBS campus, situated centrally to the SBS' existing 10 active production stages. The production office building would include approximately 90,304 square feet of enclosed interior space and would be designed to offer highly flexible, easily sub-divisible production office space. The proposed production office building would wrap a partially enclosed outdoor courtyard space that would include access to a ground-level café with outdoor seating. The proposed production office building would incorporate sustainable features into its design as part of the Proposed Project's targeted LEED Silver certification, including operable windows and access to outdoor space and natural light.

### (c) Parking Structure

The proposed primarily seven-story parking structure is anticipated to be located within the southern portion of the Project Site along Van Ness Avenue. As mentioned above, the parking structure would be located immediately adjacent to the east side of the proposed production office building, creating the visual appearance of a single building with a production office component and a parking component. In addition, the façade of the parking structure is proposed to be clad in decorative screening elements that provide articulation and visual interest. Specifically, the northeast corner of the parking structure

would feature glazed elements that serve as a marquee identifying the studio entrance. The long façade of the parking structure would be punctuated by graphic screens with printed content that may feature shows filming on site, the identity of productions filming within the Sunset Bronson Studios, or artistic and historical images conveying the legacy of the long-standing studio. The proposed parking structure would include two levels of subterranean parking and would be connected to the proposed office tower through an underground driveway and passageway. Access to the proposed parking structure would be provided through an entrance internal to the Project Site, immediately inside the Van Ness Gate as well as from a proposed driveway along Van Ness Avenue that would provide direct access to the parking structure.

### (d) Historic Sensitivity and Rehabilitation of Existing Buildings and Structures

The Proposed Project would be designed to complement and improve the sightlines to the EOB. For instance, by removing the EOB's Gene Autry Wing and northern addition that were subsequently added to the original EOB over time, the Proposed Project seeks to restore the original façade of the EOB. In addition, the proposed office building would be set back from Sunset Boulevard and landscaping would be kept low to enhance views of the historic façade. To further complement the existing EOB, the proposed office building would feature a soffit on the building's third floor that would align with the eave line of the EOB, establishing a scale relationship between the buildings. Further, the proposed office building would feature landscaping and decorative architectural features (e.g., free-standing columns atop decorative bases) along the Sunset Boulevard street frontage, to mimic the design and cadence of the historic colonnade and masonry fence line found along Sunset Boulevard. The storefront used on the first floor of the proposed office building would be recessed along Sunset Boulevard to allow the detailed, articulated façade of the EOB to be visually prominent. Lastly, the KTLA Tower, currently on the Van Ness Avenue corner, would be relocated to the front of the EOB, to its original on-site location.

The Proposed Project would visually restore the EOB and the KTLA Tower to be more consistent with their original architectural design elements. The functionality of the rehabilitated structures would remain in their current capacity, with the EOB continuing to be used for office space and the KTLA Tower continuing to serve as an ornamental visual historic element of the SBS campus. Additionally, these features would be fully integrated with the other structures proposed on-site through the use of landscaping, particularly between the EOB and the proposed office building. Rehabilitation of the impacted portions of the EOB and the KTLA Tower would conform to the Secretary of the Interior Standards and as a result, the Proposed Project would restore the EOB and the KTLA Tower to its original design and visual architectural integrity.

### (e) Landscaping

The Proposed Project would provide a landscaped area at the Van Ness Gate and another 60-foot-long landscaped setback area along Sunset Boulevard, in front of the proposed office building. Additionally, the Proposed Project would provide an outdoor seating area with landscaping immediately adjacent to the proposed production office building. The landscaped area at the Van Ness Gate would be designed to enhance the SBS's arrival area and would be accentuated by a newly planted large oak tree. The landscaped setback area along Sunset Boulevard would be designed to enhance the pedestrian environment of the Project Site by providing additional landscaping along the Sunset Boulevard streetscape. The Proposed Project would also include a small landscaped strip adjacent to the proposed parking structure along Van Ness Avenue that would include shrubs and several mature trees. In total, the Proposed Project would add approximately 21,500 square feet of new landscaping and open space. The landscaping would feature species native to California and include efficient watering devices.

### (f) Signage and Lighting

Proposed Project signage would be designed to be aesthetically compatible with the existing and proposed architecture of the site and other signage in the area. Proposed signage would include monument signage, building and tenant signage, and general ground level and wayfinding pedestrian signage, as permitted per the CRA's Design for Development for Signs in Hollywood. In addition, as described above, the long façade of the parking structure would be punctuated by graphic screens with printed content that may feature productions filming on site, the identity of prominent tenants such as KTLA 5, or artistic and historical images conveying the legacy of the long-standing studio. No off-premises billboard advertising is proposed as part of the Project.

Proposed Project lighting would include low-level exterior lights adjacent to buildings and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would also be incorporated throughout the Project Site. Proposed Project lighting has been designed to provide for efficient, effective and aesthetically pleasing lighting solutions, which would minimize light trespass from the proposed buildings and overall Project Site, reduce sky-glow to increase night sky access, and improve nighttime visibility through glare reduction. Specifically, all on-site exterior lighting would be automatically controlled via photo sensor to illuminate only when required and would be shielded or directed toward areas to be illuminated and thereby limit spillover onto nearby residential areas. In addition, all interior lighting would be equipped with occupancy sensors that would automatically extinguish lights when not in use.

### (g) Access and Circulation

Vehicular access to the Project Site's office and production office buildings would be provided via Van Ness Avenue, at the Van Ness Gate. The Van Ness Gate would continue to be the primary access point for employees and visitors to the overall SBS campus. However, as part of the Proposed Project, the Van Ness Gate would be reconstructed, including modification of the islands and extension of the queuing lanes, to better accommodate the vehicular traffic entering and exiting the overall SBS campus. An additional driveway would also be provided along Van Ness Avenue that would provide direct access into the proposed parking structure. Additionally, a new service driveway would be provided along Van Ness Avenue that would be designed to accommodate service trucks only. The Bronson Gate would also continue to provide secondary vehicular and service vehicle access. Additional service vehicle access to the SBS campus would also continue to be provided via the gated alley entrance along vacated Fernwood Avenue.

Pedestrian access would be provided through a pedestrian-friendly landscaped plaza entrance on Van Ness Avenue. Additionally, with implementation of the Proposed Project, pedestrian safety would be enhanced at the Van Ness Gate by creating a longer queuing area for entering and exiting vehicles. Sidewalks would also be provided along each side of the driveway rather than the current configuration, with the perimeter wall immediately adjacent to the driving surface. The modifications would improve visibility and provide pedestrian paths outside of the traffic lanes.

### (h) Parking

Parking for the Proposed Project would be provided in various locations on the Project Site and would include one subterranean level beneath the proposed office building that would provide approximately 100 spaces, and in the proposed primarily seven-story parking structure, which would provide approximately 1,635 spaces. The parking structure would also provide additional parking for other areas of the SBS campus. Additional parking would be provided in 65 existing surface parking spaces located throughout the SBS campus that would remain. Upon implementation of the Proposed Project, a total of 1,800 parking spaces would be available within the SBS campus. When accounting for the 401 existing parking spaces that would be removed, the Proposed Project would provide 1,399 net new parking spaces.

## 3. Public Review Process

In accordance with CEQA, the environmental review process for the Proposed Project commenced with solicitation of comments from identified responsible and trustee agencies, as well as interested parties on the scope of the Draft EIR, through a Notice of

Preparation (NOP) process. The NOP for the Draft EIR was circulated for a 30-day review period beginning September 8, 2011. In addition, a public scoping meeting was held on September 20, 2011. The public scoping meeting provided the public with the opportunity to receive information regarding the Proposed Project and to provide input regarding issues to be addressed in the Draft EIR. A copy of the NOP and responses to the NOP are provided in Appendix A of the Draft EIR.

Consistent with the requirements of Sections 15087 and 15105 of the CEQA Guidelines, the Draft EIR was submitted to the State Clearinghouse, Office of Planning and Research, and was circulated for a 45-day public review and comment period beginning on March 7, 2013, and ending on April 22, 2013. Following the Draft EIR public comment period, this Final EIR has been prepared that includes responses to the comments raised regarding the Draft EIR.

# 4. Areas of Controversy

Potential areas of controversy and issues to be resolved by the City's decision-makers may include those environmental issue areas where the potential for a significant unavoidable impact has been identified. As evaluated in Section IV of the Draft EIR and summarized below, significant and unavoidable cumulative noise impacts would result during construction and operation of the Proposed Project. Significant and unavoidable cumulative traffic impacts would also result from construction of the Proposed Project.

Based on the Draft EIR comment letters received regarding the Draft EIR, which are included in Appendix A of this Final EIR, issues known to be of concern include, but are not limited to, traffic, access, aesthetics, and views. As shown in the Matrix of Comments Received in Response to the Draft EIR provided in Section III, Response to Comments of this Final EIR, comments were also provided regarding other environmental topics addressed in the Draft EIR. Copies of the comment letters submitted regarding the Draft EIR are included in Appendix A of this Final EIR.

# 5. Summary of Alternatives

The Draft EIR considered a range of alternatives to the Proposed Project to provide informed decision-making in accordance with Section 15126.6 of the State CEQA Guidelines. The alternatives to the Proposed Project analyzed in the Draft EIR include: No Project/No Build Alternative; Reduced Project—No Production Office Alternative; and Reduced Project Density Alternative. A general description of these Alternatives is provided below.

## Alternative 1: No Project/No Build Alternative

In accordance with the CEQA Guidelines, the No Project Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states that, "in certain instances, the No Project Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, the No Project/No Build Alternative assumes that the Proposed Project would not be approved and no new development would occur within the Project Site, with the exception of routine interior and exterior improvements constructed as part of on-going business activities. Thus, the physical conditions of the Project Site would generally remain as they are today. The Project Site would continue to serve primarily as a surface parking lot, none of the existing structures would be removed, and no new buildings would be constructed. Furthermore, the Proposed Project's landscape plan and vehicular and pedestrian improvements also would not be implemented.

## Alternative 2: Reduced Project—No Production Office Alternative

The Reduced Project—No Production Office Alternative would develop the Project Site in much the same manner as the Proposed Project but would not develop the 90,304-square-foot production office building proposed by the Project. However, under the Reduced Project—No Production Office Alternative, the 314,495-square-foot office building, a parking structure, replacement guard station, and support office within the parking structure as proposed by the Project would be developed. In addition, as with the Proposed Project, the demolition of 14,499 square feet of on-site office and support uses as well as the removal of 401 parking spaces proposed by the Project would occur under this Alternative.

Similar to the Proposed Project, parking for the Reduced Project—No Production Office Alternative would be provided in various locations on the Project Site and would include one subterranean level beneath the proposed office building, a proposed parking structure, and within the 65 surface parking spaces that would remain on the Project Site. However, as the production office would not be developed, this Alternative would provide fewer parking spaces compared to the Proposed Project. Access points for this Alternative would also remain the same as the Proposed Project with access provided via driveways on Van Ness Avenue, Bronson Avenue, and a service-only driveway located along the vacated Fernwood Avenue roadway.

The architectural design and materials, signage and lighting also would be expected to be similar to the Proposed Project, with the exception of the architectural design and

massing associated with the production office building that would not be developed under this Alternative. In addition, as with the Proposed Project, this Alternative would incorporate a landscape plan that would provide landscaped pedestrian-oriented open space to enhance the pedestrian environment of the Project Site. Furthermore, like the Proposed Project, this Alternative would be designed and constructed to achieve the Silver level under the US Green Building Council's LEED green building program. LEED standards would be incorporated through measures that would reduce energy and water usage.

Additionally, as with the Proposed Project, construction of the Reduced Project—No Production Office Alternative would commence in 2014. However, given the reduction in overall development, this Alternative would reduce the amount of construction, or construction intensity, compared to the Proposed Project. Approvals required for development of this Alternative would be similar to those required under the Proposed Project and would include a Conditional Use Permit for a Major Development Project; Site Plan Review; Cultural Heritage Commission Review; Haul Route approval; and demolition, grading, excavation, foundation, and associated building permits as required.

## Alternative 3: Reduced Project Density Alternative

A reduction in overall development proposed by the Project would occur under the Reduced Project Density Alternative. The Reduced Project Density Alternative would develop the Project Site in the same manner as the Proposed Project and would include development of the office building, production office building, a parking structure, replacement guard station, and support office within the parking structure as proposed by the Project. However, this Alternative would reduce the proposed development by 30 percent. Specifically, with the reduction in development by 30 percent, the Reduced Project Density Alternative would include development of an approximately 220,147-square-foot office building compared to the 314,495-square-foot office building proposed by the Project and an approximately 63,213-square-foot production office building compared to the 90,304-square-foot production office building proposed by the Project. In addition, as with the Proposed Project, the demolition of 14,499 square feet of on-site office and support uses as well as the removal of 401 parking spaces proposed by the Project would occur under this Alternative.

While parking for this Alternative would be reduced based on the net new development of office uses, as with the Proposed Project, parking for the Reduced Project Density Alternative would be provided in various locations on the Project Site and would include one subterranean level beneath the proposed office building, a parking structure, and within the 65 surface parking spaces that would remain on the Project Site. However, as development within the Project Site would be reduced, this Alternative would provide

fewer parking spaces compared to the Proposed Project. Access points for this Alternative would also remain the same as the Proposed Project with access provided via driveways on Van Ness Avenue, Bronson Avenue, and a service-only driveway located along the vacated Fernwood Avenue roadway.

The architectural design and materials, signage and lighting also would be expected to be similar to the Proposed Project. However, building massing and heights would be reduced when compared with the Proposed Project due to the reduction in square footage proposed. In addition, as with the Proposed Project, this Alternative would incorporate a landscape plan that would provide landscaped pedestrian-oriented open space to enhance the pedestrian environment of the Project Site. However, as the building footprints would be somewhat smaller under this Alternative, Alternative 3 would be expected to provide additional open space when compared with the Proposed Project. Furthermore, like the Proposed Project, this Alternative would be designed and constructed to achieve the Silver level under the US Green Building Council's Leadership in Energy Efficiency and Design (LEED) green building program. LEED standards would be incorporated through measures that would reduce energy and water usage.

Additionally, as with the Proposed Project, construction of the Reduced Project Density Alternative would commence in 2014. However, the decrease in total development would decrease the overall amount of construction activities occurring on-site. Approvals required for development of this Alternative would be similar to those required under the Proposed Project and would include a Conditional Use Permit for a Major Development Project; Site Plan Review; Cultural Heritage Commission Review; Haul Route approval; and demolition, grading, excavation, foundation, and associated building permits as required.

# 6. Summary of Environmental Impacts and Mitigation Measures

Table I-1 on page I-12 provides a summary of the environmental impacts of the Proposed Project. These impacts are summarized as follows:

**Table I-1**
**Summary of Environmental Impacts of the Proposed Project**

| Environmental Issue | Proposed Project Impact |
|---|---|
| **A. AESTHETICS, VIEWS, LIGHT/GLARE AND SHADING** | |
| *Construction* | |
| Aesthetics/Visual Quality | Less Than Significant |
| Light | Less Than Significant |
| *Operation* | |
| Aesthetics/Visual Quality | Less Than Significant |
| Views | Less Than Significant |
| Light/Glare | Less Than Significant |
| Shading | Less Than Significant |
| **B. AIR QUALITY** | |
| *Construction* | |
| Regional Emissions | Less Than Significant |
| Local Emissions | Less Than Significant |
| Toxic Air Contaminants | Less Than Significant |
| Odors | Less Than Significant |
| *Operation* | |
| Regional Emissions | Less Than Significant |
| Local Emissions | Less Than Significant |
| Toxic Air Contaminants | Less Than Significant |
| Odors | Less Than Significant |
| **C. GREENHOUSE GAS EMISSIONS** | Less Than Significant |
| **D. HISTORIC RESOURCES** | Less Than Significant |
| **E. LAND USE** | |
| Land Use Consistency | Less Than Significant |
| Land Use Compatibility | Less Than Significant |
| **F. NOISE** | |
| Construction | Project Impact Less Than Significant with Mitigation and Significant Cumulative Impact |
| Operation | Project Impact Less Than Significant and Significant Cumulative Traffic Noise Impact |
| Vibration | Less Than Significant |
| **G. TRAFFIC, ACCESS, AND PARKING** | |
| *Construction* | Project Impact Less Than Significant with Mitigation and Significant Cumulative Impact |
| *Operation* | |
| Intersections/Street Segments | Less Than Significant With Mitigation |
| Neighborhood Intrusion | Less Than Significant |
| Access and Circulation | Less Than Significant |

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

| Environmental Issue | Proposed Project Impact |
|---|---|
| Parking | Less Than Significant |
| Public Transit | Less than Significant |
| Pedestrian/Bicycle Circulation & Safety | Less than Significant |
| **H. WATER SUPPLY** | |
| *Water Supply* | |
| Construction | Less Than Significant |
| Operation | Less Than Significant |

*Source: Matrix Environmental, 2013.*

# A. Aesthetics, Views, Light/Glare, and Shading

## a. Project Impacts

### *(1) Aesthetics/Visual Quality*

#### *(a) Construction*

During construction activities for the Proposed Project, the visual appearance of the Project Site would be altered due to the removal of existing buildings, surface parking areas, and/or landscaping. However, the Project Site is currently surrounded by various visual barriers that obstruct public views of on-site studio activities, including a painted cinderblock wall along portions of Van Ness Avenue and a decorative painted brick wall along portions of Sunset Boulevard. Thus, although the aesthetic quality of the visual barrier around the Project Site would temporarily change during construction to one that is not visually uniform with the remainder of the Project Site in material and color scheme, overall views into the Project Site would not be substantially altered. In addition, temporary construction fencing would be placed along the periphery of the Project Site to screen much of the on-site construction activity from view at the street level.

The Proposed Project construction activities may also require the removal of several mature street trees located in the public right-of-way along Van Ness Avenue. It is important to note that the tree planters along Van Ness Avenue are not all occupied, as trees removed from these planters have not been consistently replaced. Nonetheless, the Proposed Project would replace all removed trees in accordance with the City of Los Angeles Street Tree Ordinance and more consistent landscaping would be provided along

Van Ness Avenue. The mature palm trees that line Sunset Boulevard in front of the Project Site within the public right-of-way would not be removed.

Visible construction activities would also include truck traffic to and from the Project Site. The intensity of construction trucks for the duration of the construction period would impact the visual quality of the area, though not to a significant degree, since the local major roadways are intended to accommodate a range of vehicle types, including trucks incidental to construction and deliveries. Furthermore, as construction activities would be temporary, the visual impacts associated with construction would cease after completion of the Proposed Project.

Based on the above, construction activities associated with the Proposed Project would not substantially alter, degrade, or eliminate the existing visual character of the Project Site, or generate substantial long-term contrast with the visual character of the surrounding area. Therefore, visual quality impacts associated with construction of the Proposed Project would be less than significant. Furthermore, Mitigation Measures A-1 and A-2, provided below, are included to further ensure that impacts would remain less than significant.

*(b) Operation*

The Proposed Project would visually alter the Project Site by developing a denser configuration of new buildings integrated with landscaped areas. However, the Proposed Project's uses would be an integrated part of the studio uses within the SBS campus to the south and east. In addition, the proposed renovations to the EOB and the relocation of the KTLA Tower would conform to the Secretary of the Interior Standards for the Treatment of Historic Properties and would be considered a beneficial impact relative to aesthetics as the EOB would be restored to its original condition. Furthermore, the relocation of the KTLA Tower back to the place it once stood would restore its integrity of location and would enhance the EOB's integrity of setting. Proposed parking on-site would be designed to maximize efficiency and minimize visual impacts by locating parking within a parking structure that would be largely screened from off-site public views along surrounding streets by proposed buildings and landscaping. The Proposed Project's increased landscaping along Sunset Boulevard and Van Ness Avenue, in conjunction with replacing a surface parking lot with buildings of uniform design that respect nearby historic resources, would enhance the appearance of the Project Site and the surrounding area and would promote controlled-access pedestrian activity within the Project Site and the SBS campus.

Relative to surrounding development, the Proposed Project would result in greater density and scale of development at the Project Site when compared with existing conditions. However, based on the heights of existing buildings within the immediate Project Site vicinity and beyond, the Proposed Project would not contrast sharply with

existing surrounding development or other more distant properties. As such, the Proposed Project would be consistent with the aesthetic image of the Project Site area, including the size, scale, mass and density of nearby development. Additionally, the SBS campus is strategically located at a gateway to Hollywood. The proposed office tower would establish a strong identity for the Van Ness Avenue corner, and in combination with the existing 12-story Metropolitan Residential Tower across Sunset Boulevard, the Proposed Project's 14-story office building would help to create a discernible visual threshold to the Hollywood area on Sunset Boulevard. In addition, the Proposed Project would be designed to provide visual interest, since all of the buildings would vary in height, bulk and massing, thus creating an identity that is distinctive yet compatible with surrounding uses. The Proposed Project would also incorporate design elements with an architectural theme that complements the existing character of the Sunset Boulevard commercial corridor. Therefore, the Proposed Project's increase in density and building height would be in character with the surrounding commercial and mixed-use development and other more distant properties.

The Proposed Project would include lighting for purposes of providing security and aesthetic enhancements, while also being sensitive to nearby properties. In addition, the replacement of pole-mounted parking lot lighting with attractive security and architectural lighting would improve the aesthetic character of the Project Site. Moreover, the existing sense of privacy would be reduced, as the walls that currently are provided for the purpose of obstructing views of the Proposed Project's interior would be replaced by buildings and landscaping that would serve the same purpose. Further, the Proposed Project would create new open spaces with landscaping visible to the public, particularly along Sunset Boulevard and Van Ness Avenue. The Proposed Project would also incorporate signage consistent with the signage regulations of the LAMC, the Hollywood Redevelopment Plan, and the CRA's Design for Development for Signs in Hollywood. Proposed signage would include general ground level and wayfinding pedestrian signage, as permitted per CRA's Design for Development for Signs in Hollywood and would be of a proper scale to motorists and pedestrians. In addition, the long façade of the parking structure would be punctuated by graphic screens with printed content that may feature shows filming on site, the identity of prominent tenants such as KTLA 5, or artistic and historical images conveying the legacy of the long-standing studio. As such, signage would be visually integrated with the proposed development on the Project Site and would further add visual interest and texture to building façades.

Based on the above, the Proposed Project would not degrade the visual character of the Project Site or surrounding area, would be aesthetically compatible with surrounding uses, and would positively contribute to the high activity, mixed-use nature of the area. Therefore, the Proposed Project's visual quality impacts would be less than significant. Nonetheless, Mitigation Measures A-3 through A-7, provided below, are included to further ensure that impacts would remain less than significant.

*(2) Views*

The Proposed Project—the 14-story office building, in particular—would be visible from many locations to the south, southeast, and southwest. While Proposed Project buildings may partially obstruct views of the Hollywood Hills, such views are currently available on an intermittent basis along certain portions of local north-south roadways (e.g., Van Ness Avenue, Bronson Avenue, Wilton Place, Gower Street, etc.) and more limited segments of some east-west roadways (primarily along portions of Sunset Boulevard), and such views would continue to be available on an intermittent basis along roadway segments throughout the Project area. Therefore, the Proposed Project would not eliminate northerly views of the view resources in the area.

Project implementation would alter views of the skyline, and the new structures would be visible from nearby and elevated view points. However, views of valued visual resources are not generally available under existing conditions, and thus, none would be obstructed by the Proposed Project. In addition, the existing view corridor along Sunset Boulevard would remain and as distance increases from the Project Site, proposed development would feature less dominantly within southerly views. Furthermore, while the upper stories of the new office tower would be clearly visible, intervening structures and landscaping would partially obscure views of the Proposed Project and would not substantially alter views in the context of the greater urban landscape. Additionally, while views from the Hollywood Hills would experience minor interruption of the distant horizon due to the Proposed Project, the horizon line is presently interrupted by existing mid- and high-rise buildings in the area, as well as the downtown Los Angeles skyline in the distance, and thus the Proposed Project would not represent a substantial change from existing conditions. Moreover, long-range views from the Hollywood Hills are generally not sensitive to individual development projects, like the Proposed Project, since such projects are subordinate to broader views of the urban landscape. In addition, the Proposed Project would blend in with the surrounding urban environment and would continue to appear as part of the fabric of urban development. Similar effects would be expected from vantage points throughout the Hollywood Hills, including from other public roadways as well as private residential properties; it is noted, however, that due to heavy vegetation and landscaping, many hillside vantages have limited views, if any, of the Project area and surrounding skyline. Therefore, since the Proposed Project would not substantially obstruct views of visually prominent resources from vantages to the north, impacts would be less than significant.

With regard to west-facing views, similar to other nearby views of the Project Site, Proposed Project development would be visually evident but would not obstruct views of valued visual resources from most vantage points. The Proposed Project development would merely block views of other, more distant buildings to the west of the Project Site. In addition, as distance increases from the Project Site, intervening structures obscure much

of the view of proposed development, and the Proposed Project has less of an effect on existing views. Furthermore, valued west-facing views of other visual resources would not be significantly affected and views of the SBS campus buildings and other nearby structures along Sunset Boulevard would continue to be available. Though altered by Proposed Project development, views of the open sky would continue to exist both above the Project Site and throughout the area. The Proposed Project would not substantially obstruct views of visually prominent resources from vantages to the east, and impacts would be less than significant.

As with other vantages in the surrounding area, views of valued visual resources are not available from the west under existing conditions due to the presence of existing SBS campus buildings to the west of the Project Site, and thus, views of valued visual resources would not be obstructed by the Proposed Project. Therefore, as development would not obstruct an existing view of a visually prominent resource, east-facing view impacts would be less than significant.

*(3) Light/Glare*

*(a) Light Impacts*

Construction

Construction activities would occur primarily during daylight hours and any spillover light to the west and south would be blocked by existing SBS campus buildings. Further, any construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements, and would only occur for the duration needed in the finite construction process. Thus, with adherence to existing LAMC regulations, light resulting from construction activities would not significantly impact residential uses, substantially alter the character of off-site areas surrounding the construction area, or interfere with the performance of an off-site activity. Therefore, light impacts associated with construction would be less than significant.

Operation

The Proposed Project would introduce new lighting on the Project Site and, thus, would increase ambient light levels on the Project Site and immediate vicinity. Exterior light sources would consist of low level lighting for security, wayfinding, architectural, and landscaping purposes and, would be directed onto the areas to be lit and shielded to minimize light spillover effects. In addition, in accordance with the Hollywood Redevelopment Plan, a lighting plan would be submitted to the Designated Local Authority to ensure that Proposed Project lighting would be directed and/or shielded to minimize

spillage onto other properties. Proposed Project lighting would also meet all applicable LAMC lighting standards.

Interior light spillage from windows of the proposed uses, including the 14-story office building, would also contribute to an increase in ambient nighttime lighting levels, but such an increase would not be substantial as the Project Site area is already characterized by medium-high nighttime lighting levels primarily due to the existing restaurant, retail, and entertainment uses. Furthermore, light-sensitive uses such as residential uses are not located immediately adjacent to the Project Site. Therefore, the increase in ambient light would not alter the character of the area and would not interfere with nearby residential uses. As such, the Proposed Project would not create a new source of substantial light which would adversely affect day or nighttime views in the area and Proposed Project lighting impacts would be less than significant. Furthermore, Mitigation Measures A-5 and A-6, listed below, are included to further ensure that specific design features would be implemented and that lighting impacts would remain less than significant.

*(b) Glare Impacts*

Architectural materials would likely include materials such as glass, clay/terracotta, stainless steel, and concrete. While clay/terracotta and concrete are non-reflective, the use of glass and stainless steel or other polished surfaces could have the potential to produce glare. During late afternoons in the winter months, the Proposed Project would be visible from major eastbound roadways, such as Sunset Boulevard, concurrent with the sun lowering in the southwestern horizon. This configuration has the potential to cause glare from any shiny façade materials or windows on the Proposed Project's western façade. Reflective glare would not be expected during winter morning hours or during the other seasons of the year along Sunset Boulevard or other streets approaching the Project Site due to the respective positions of the sun. However, implementation of Mitigation Measure A-7 that requires that exterior windows and glass used on building surfaces be non-reflective or treated with a non-reflective coating would be included to reduce potential impacts to a less than significant level.

*(4) Shading*

Shadows of the Proposed Project would not shade sensitive uses for more than the City's significance thresholds during the winter, spring, summer, or fall. Therefore, shadow impacts would be less than significant.

## b. Cumulative Impacts

### *(1) Aesthetics/Visual Quality*

In general, the land use plans that guide development in the Proposed Project area anticipate the intensification of existing commercial and residential land uses in the surrounding area. Development of low-rise structures and lower intensity development would not be anticipated to have a substantial aesthetic effect since the Project Site area is already highly urbanized. Future development of mid- or high-rise structures, however, may change the density and visual character of the area over time. These future developments, including the 57 related projects, would be subject to City discretionary review to ensure consistency with adopted guidelines and standards that address aesthetics (e.g., LAMC height limits and density, Community Plan design guidelines, etc). Therefore, it is not anticipated that future development would introduce new aesthetic elements that would be substantially out of scale or character with the Proposed Project area's visual environment.

### *(2) Views*

Views within the Project Site area that have the potential to be affected by development on a cumulative basis are north-facing views of the Hollywood Hills and Hollywood Sign. Based on the locations of the Proposed Project and the related projects, and location of the Hollywood Sign to the northeast of the Project Site, existing development and topography, and building massing proposed by the related projects, development of the Proposed Project and related projects would not obstruct views of the Hollywood Sign as viewed from the viewshed of the Project Site. Similarly, based on the location of the related projects and the Project Site, the distance to the Hollywood Hills and existing intervening development and topography, it is not expected that cumulative impacts associated with public viewsheds of the Hollywood Hills would occur.

### *(3) Light/Glare*

Development of the Proposed Project as well as the related projects in the area would introduce new or expanded sources of artificial light. Consequently, ambient light levels are likely to increase in the Project area. However, given the location within the highly urbanized Hollywood Community, the additional artificial light sources introduced by these projects would not significantly alter the existing medium-high lighting environment that is currently created by the prominent nightlife of Hollywood. Additionally, cumulative lighting would not be expected to interfere with the performance of off-site activities given the high ambient light levels already present. As a result, cumulative artificial light impacts would be less than significant.

With regard to glare, it is anticipated that the related projects within the vicinity of the Project Site would be subject to discretionary review to ensure that building materials to be utilized would not create significant glare impacts. In addition, since the Proposed Project's potential glare impacts would be eliminated through implementation of recommended mitigation, it would not contribute to any cumulative increase in glare in combination with the related projects. As such, cumulative glare impacts are concluded to be less than significant.

#### *(4) Shading*

While two related projects would be located sufficiently near the Project Site, only one related project (Related Project No. 28) could potentially create cumulative shading impacts in conjunction with the Proposed Project. This related project, located along Sunset Boulevard further west of the Project Site, features a mixed-use development including condominium, office, and retail uses. Since shadows move in a northwesterly to northeasterly direction, the shadows of this related project would extend northwest toward the adjacent commercial uses during the morning hours. During the afternoon, such shadows would extend northeasterly and thus, would not overlap with Proposed Project shadows. As these shadows in combination with Proposed Project shadows would not affect sensitive uses for longer than that established by the significance thresholds, cumulative shading impacts would be less than significant.

### c. Mitigation Measures

#### *(1) Construction*

While Proposed Project construction-related aesthetic impacts would be less than significant, the following mitigation measures are included to ensure that potential aesthetic impacts remain less than significant:

**Mitigation Measure A-1:** Temporary fencing with screening material shall be used around the perimeter of the Project Site to buffer views of construction equipment and materials.

**Mitigation Measure A-2:** The Applicant shall ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways, and that such temporary barriers and walkways are maintained in a visually attractive manner throughout the construction period.

*(2) Operation*

While aesthetics impacts would be less than significant during operation of the Proposed Project, the following mitigation measures are proposed to ensure that potential aesthetic impacts remain less than significant:

**Mitigation Measure A-3:** The Applicant shall prepare a street tree plan to be reviewed and approved by the City's Department of Public Works, Street Tree Division. All plantings in the public right-of-way shall be installed in accordance with the approved street tree plan.

**Mitigation Measure A-4:** All landscaped areas shall be maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect to the satisfaction of the City of Los Angeles Department of Planning.

**Mitigation Measure A-5:** All new street and pedestrian lighting required for the Project shall be shielded and directed away from any off-site light-sensitive uses.

**Mitigation Measure A-6:** Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light spillover onto adjacent properties.

**Mitigation Measure A-7:** All exterior windows and glass used on building surfaces shall be non-reflective or treated with a non-reflective coating.

**Mitigation Measure A-8:** All on-site exterior lighting shall be automatically controlled via photo sensor to illuminate only when required.

## d. Level of Significance After Mitigation

*(1) Aesthetics/Visual Quality*

As previously noted, aesthetic impacts during construction associated with the Proposed Project would be less than significant. Notwithstanding, the proposed mitigation measures would serve to screen views of construction activity and help maintain a visually attractive construction site. As such, with implementation of mitigation, construction-related aesthetic impacts would be further reduced.

*(2) Views*

As discussed above, valued views of the Hollywood Hills and Hollywood Sign would not be significantly obstructed as a result of the Proposed Project. View impacts would be less than significant and no mitigation measures are required.

*(3) Light/Glare*

While the Proposed Project would increase light levels on-site, the increase in ambient light would not alter the character of the area and would not interfere with nearby residential uses. In addition, implementation of the proposed mitigation measures would ensure that light impacts would be less than significant.

While acute glare conditions which hazardously interfere with driving are rare, they may have the potential to occur in conjunction with the proposed office building. However, implementation of the proposed mitigation measures, including the use of non-reflective glass or non-reflective coatings and coordination with the City Planning Department, would ensure that glare impacts are less than significant.

*(4) Shading*

Proposed Project shadows would affect nearby sensitive receptors during varying portions of the day throughout the seasons of the year but would have no significant effect at any of the identified sensitive uses during the winter solstice, summer solstice, spring equinox, or fall equinox. As such, shading impacts would be less than significant and no mitigation measures are required.

# B. Air Quality

## a. Project Impacts

*(1) Construction Impacts*

*(a) Regional Emissions*

Construction of the Proposed Project has the potential to create air quality impacts through the use of heavy-duty construction equipment, deliveries of construction materials to the Project Site as well as the hauling off of dirt and/or construction debris, and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition, site grading/excavation, and construction activities. Mobile source emissions, primarily $NO_X$, would result from the use of construction equipment such as excavators, loaders, and cranes. During the finishing phase, paving operations and the application of architectural coatings (e.g., paints) and other building materials would release VOCs. However, construction-related daily emissions would not exceed the regional emissions thresholds recommended by the South Coast Air Quality Management District (SCAQMD) for VOC, $NO_X$, CO, $SO_X$, $PM_{10}$, and $PM_{2.5}$ during any of the construction phases of the Proposed Project. Therefore, the Proposed

Project would result in a less than significant impact with regard to regional construction emissions.

*(b) Localized Emissions*

The conservative estimate of maximum on-site daily emissions for $NO_X$, $PM_{10}$, $PM_{2.5}$, and CO was compiled for each phase of construction and compared to the applicable screening threshold based on construction site acreage and distance to closest receptor. Maximum localized construction emissions for off-site sensitive receptors would not exceed the localized screening thresholds for CO, $NO_X$, $PM_{10}$ and $PM_{2.5}$. Therefore, the Proposed Project would result in a less than significant impact with regard to localized construction emissions.

*(c) Toxic Air Contaminants*

The greatest potential for toxic air contaminant (TAC) emissions would be related to diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. Because the construction schedule estimates that the phases which require the most heavy-duty diesel equipment usage, such as site grading and excavation, would last for a much shorter duration (i.e., approximately three months), construction of the Proposed Project would not result in a long-term (i.e., 70 years) substantial source of TAC emissions. Additionally, the SCAQMD CEQA guidance does not require a health risk assessment for short-term construction emissions. It is therefore not meaningful to evaluate long-term cancer impacts from construction activities that occur over a relatively short duration. In addition, there would be no residual emissions after construction and no corresponding individual cancer risk. As such, Project-related toxic emission impacts during construction would be less than significant.

*(d) Odors*

During the Proposed Project's construction phase, activities associated with the operation of construction equipment, the application of asphalt, the application of architectural coatings and other interior and exterior finishes, and roofing may produce discernible odors typical of most construction sites. SCAQMD Rule 1113 limits the amount of volatile organic compounds from architectural coatings and solvents to further reduce the potential for odiferous emissions. In addition, as construction-related emissions dissipate away from the construction area, the odors associated with these emissions would also decrease and would be quickly diluted. Therefore, impacts associated with objectionable odors during construction would be less than significant.

*(2) Operational Impacts*

*(a) Regional Emissions*

Regional air pollutant emissions associated with Proposed Project operations would primarily be generated by the consumption of electricity and natural gas, and by the operation of on-road vehicles. The net operational emissions associated with the Proposed Project would not exceed the established SCAQMD regional threshold levels for VOC, $NO_X$, CO, $So_x$, $PM_{10}$, and $PM_{2.5}$. Therefore, impacts associated with regional operational emissions would be less than significant.

*(b) Localized Emissions*

Project-generated traffic volumes are forecasted to have a negligible effect on the projected 1-hour and 8-hour CO concentrations at the intersections analyzed for the Proposed Project. Since a significant impact would not occur at the intersections recommended for analysis per SCAQMD guidance, no significant impacts would be expected to occur at any other analyzed roadway intersection as a result of Project-generated traffic volumes. Thus, the Proposed Project would not cause any new or exacerbate any existing CO hotspots, and, as a result, impacts related to localized mobile-source CO emissions would be less than significant.

The Proposed Project may include the installation and operation of diesel-fired generators for emergency power generation. Unless a blackout occurs, these generators would be operated for only a few hours per month for routine testing and maintenance purposes. The Applicant would be required to obtain a permit to construct and a permit to operate any standby generators under SCAQMD Rules 201, 202, and 203. In addition, under SCAQMD Regulation XIII, all generators must meet best available control technology requirements to minimize emissions of $PM_{10}$ (as well as CO, VOC, and $NO_X$ emissions). Compliance with SCAQMD Rules and Regulations regarding stationary-source combustion equipment would ensure that contributions to localized $PM_{10}$ concentrations remain below the 2.5 $\mu g/m^3$ significance threshold. As such, any potential impacts would be less than significant.

*(c) Toxic Air Contaminants*

Based on SCAQMD guidance and CARB siting guidelines, the Proposed Project is not considered to be a substantial source of diesel particulate matter warranting a refined health risk assessment. In addition, diesel particulate matter from delivery trucks (e.g., truck traffic on local streets and on-site truck idling) would be minimal since office uses do not require a substantial number of truck trips. Furthermore, any delivery trucks that would access the Project Site would not idle on the Project Site for extended periods of time, in compliance with California Air Resources Board–mandated airborne toxic control measure

idle time limit of five minutes. Therefore, while the Proposed Project would result in an increase in the square footage and presumably an increase in the number of delivery trucks, this airborne toxic control measure would substantially limit the potential incremental increase in emissions from loading dock activity. Additionally, all new generators would be required to comply with all applicable rules and regulations including the use of best available control technology. If the installation of new generators results in multiple generator groups, the installation would also be required to comply with recently promulgated Rule 1472 to ensure that localized risk remains below thresholds. Compliance with Rule 1472, if applicable, along with the low operational hours would result in substantially reduced potential impacts. Based on the low incremental increase in the number of potential contaminant sources and the long-term (annual average) activity of the on-site toxic air contaminant sources, the Proposed Project would not warrant the need for a refined health risk assessment, and potential air toxic impacts to on- and off-site receptors from on-site sources would be less than significant.

Typical sources of acutely and chronically hazardous toxic air contaminants include industrial manufacturing processes. The Proposed Project would not include any of these potential sources. It is expected that quantities of any hazardous toxic air contaminants located on-site would be below thresholds warranting further study. As such, the Proposed Project would not expose sensitive receptors to substantial pollutant concentrations and no significant impact on human health would occur.

*(d) Odors*

Land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Proposed Project does not include any uses identified by the SCAQMD as being associated with odors. In addition, garbage collection areas for the Proposed Project would be covered and situated away from the property line and sensitive uses and good housekeeping practices would be sufficient to prevent nuisance odors. Therefore, the Proposed Project would not result in the creation of objectionable odors and potential odor impacts would be less than significant.

*(e) SCAQMD CEQA Air Quality Handbook Policy Analysis*

Proposed Project development would not have a short-term or long-term impact on the region's ability to meet state and federal air quality standards as the Proposed Project's regional and localized impacts are all less than significant. Further, the Proposed Project would comply with SCAQMD Rule 403. Also, the Proposed Project would be consistent with the goals and policies of the Air Quality Management Plan for control of fugitive dust. In addition, the Proposed Project's long-term influence would be consistent with the goals

and policies of the Air Quality Management Plan and would, therefore, not conflict with or obstruct implementation of SCAQMD's Air Quality Management Plan.

## b. Cumulative Impacts

### *(1) Construction*

Daily emissions of VOC, $NO_X$, CO, $PM_{10}$, $PM_{2.5}$, and $SO_X$ would be adverse but less than significant, as the estimated net emissions for these pollutants would be below their respective SCAQMD significance thresholds. Consequently, the Proposed Project would have a less than significant cumulative impact due to construction-related regional criteria pollutant emissions.

In terms of localized air quality impacts, construction of the Proposed Project would have a less than significant cumulative impact since localized CO, $NO_2$, $PM_{10}$, and $PM_{2.5}$ emissions remain below significance thresholds. As such, the Proposed Project would not result in a cumulative considerable net increase of any criteria pollutant for which the Basin is in non-attainment and therefore, cumulative impacts to air quality during construction of the Proposed Project would be less than significant.

Similar to the Proposed Project, the greatest potential for TAC emissions at each related project would involve diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. As with the Proposed Project, construction activities at each related project would not result in a long-term (i.e., 70 years) substantial source of TAC emissions. Additionally, the SCAQMD CEQA guidance does not require a health risk assessment for short-term construction emissions. It is therefore not meaningful to evaluate long-term cancer impacts from construction activities which occur for a relatively short duration. As such, cumulative toxic emission impacts during construction would be less than significant.

Also similar to the Proposed Project, potential sources that may emit odors during construction activities at each related project would include the use of roofing materials, architectural coatings, and solvents. Via mandatory compliance with SCAQMD Rules, it is anticipated that construction activities or materials used in the construction of the related projects would not create objectionable odors. Thus, odor impacts from the related projects are anticipated to be less than significant individually, as well as cumulatively in conjunction with the Proposed Project.

*(2) Operation*

As discussed above, peak daily emissions of operation-related pollutants would not exceed SCAQMD regional and localized significance thresholds. Therefore, the emissions of non-attainment pollutants and precursors generated by Proposed Project operations in excess of the SCAQMD project-level thresholds would not be cumulatively considerable and impacts would be less than significant.

Cumulative development is not expected to expose sensitive receptors to substantial pollutant concentrations. As stated above, future 1-hour and 8-hour CO concentrations near the study intersections would not exceed their respective national or state ambient air quality standards. Therefore, CO hotspots would not occur near these intersections in the future, and, as a result, cumulative impacts related to localized mobile-source CO emissions would be less than significant.

With respect to TAC emissions, neither the Proposed Project nor any of the related projects would represent a substantial source of TAC emissions, which are typically associated with large-scale industrial, manufacturing, and transportation hub facilities. Based on recommended screening level siting distances for TAC sources, as set forth in the California Air Resources Board's Land Use Guidelines, the Proposed Project and the related projects would likely generate minimal TAC emissions related to the use of diesel truck idling, consumer projects and landscape maintenance activities, among other things. Pursuant to California Assembly Bill 1807, which directs the California Air Resources Board to identify substances as TAC and adopt airborne toxic control measures to control such substances, the SCAQMD has adopted numerous rules that specifically address TAC emissions. These SCAQMD rules have resulted in and will continue to result in substantial Basin-wide TAC emissions reductions. As such, cumulative TAC emissions during long-term operations would be less than significant. In addition, the Proposed Project would not result in any new sources of TACs that have been identified under the California Air Resources Board's Land Use Guidelines, and thus would not contribute to a cumulative impact.

Regarding potential odor impacts, neither the Proposed Project nor any of the related projects have a high potential to generate odor impacts. Furthermore, any related project that may have a potential to generate objectionable odors would be required by SCAQMD Rule 402 (Nuisance) to implement best available control technology to limit potential objectionable odor impacts to a less than significant level. Thus, potential odor impacts from the related projects are anticipated to be less than significant individually and cumulatively.

Since the Proposed Project would not jeopardize attainment of the air quality standards in the Air Quality Management Plan for the South Coast Air Basin and the

Los Angeles County portion of the South Coast Air Basin as well as the policies set forth in the City's General Plan Air Quality Element, the Proposed Project would not have a cumulatively considerable contribution to a potential conflict with or obstruction of the implementation of applicable air quality plans.

## c. Mitigation Measures

### *(1) Construction*

Although the Proposed Project would result in a less than significant impact with regard to regional and localized construction emissions, the following mitigation measures are included to reduce construction emissions associated with the Proposed Project:

**Mitigation Measure B-1:** Proposed buildings shall be designed to minimize the need for the application of architectural coatings; and where the application of architectural coatings is necessary, shall use low and zero VOC coatings to the extent feasible.

**Mitigation Measure B-2:** The Project Applicant shall require by contract specifications that construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for an extended period of time (i.e., five minutes or longer).

### *(2) Operation*

No mitigation measures are necessary as Proposed Project impacts would be less than significant.

## d. Level of Significance After Mitigation

While the Proposed Project would not result in a significant impact with regard to construction emissions, implementation of the mitigation measures described above would further reduce construction emissions for all pollutants. In addition, as actual construction activities would on average occur at a somewhat reduced level compared to the maximum predicted day and would have a corresponding reduction in pollutant emissions, the modeled set of conservative assumptions overstates the potential localized impacts. Thus, as Proposed Project impacts during construction would be less than significant, cumulative impacts associated with construction of the Proposed Project also would be less than significant.

No notable impacts related to TAC emissions during construction are anticipated to occur for the Proposed Project. As such, potential impacts would be less than significant.

The Proposed Project is not anticipated to generate a substantial amount of objectionable odor emissions during construction. Via mandatory compliance with SCAQMD Rules, no construction activities or materials are proposed that would create objectionable odors. As such, potential impacts would be less than significant.

The operational emissions associated with the Proposed Project would not exceed the established SCAQMD threshold levels for any criteria pollutants. Therefore, this impact would be less than significant. Impacts with regard to TACs and odors during operations would also be less than significant. In addition, the Proposed Project would also be consistent with SCAQMD and City of Los Angeles air quality policies, thereby constituting a less than significant impact. Cumulative operational impacts would also be less than significant.

## C. Greenhouse Gas Emissions

### a. Project Impacts

#### *(1) Construction*

Construction emissions represent episodic greenhouse gas (GHG) emissions and would be associated with site preparation, excavation, grading, and construction. Emissions are also associated with the operation of construction equipment and the disposal of construction waste, as well as episodic water use for fugitive dust control and annual water consumption. Only GHG emissions from on-site demolition and construction activities and off-site hauling and construction worker commuting are considered Project-generated. Construction of the Proposed Project is estimated to generate a total of 2,967 metric tons of carbon dioxide equivalent, which equates to 99 metric tons annually if amortized over the Proposed Project's lifetime.

#### *(2) Operation*

Greenhouse gas emissions from the operation of the Proposed Project are associated with the operation of mobile sources, electricity, natural gas, water usage/ wastewater generation, and solid waste generation and disposal. With the incorporation of project design features and state mandates, the Proposed Project would result in a total of 8,841 metric tons of carbon dioxide equivalent. This represents a reduction of 1,816 metric tons of carbon dioxide equivalent or a 17 percent reduction from "business as usual." With the achievement of a 17 percent total reduction from "business as usual," the Proposed

Project's climate change impacts with regard to GHG emissions would be less than significant.

### b. Cumulative Impacts

Although the Proposed Project is expected to emit GHGs, the emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect. Rather, it is the increased accumulation of GHGs in the atmosphere from more than one project and many sources that may result in global climate change. The resultant consequences of that climate change can cause adverse environmental effects. The State has mandated a goal of reducing statewide emissions to 1990 levels by 2020, even though statewide population and commerce is predicted to continue to expand. In order to achieve this goal, the California Air Resources Board is in the process of establishing and implementing regulations to reduce statewide GHG emissions. However, currently there are no applicable significance thresholds, specific reduction targets, and no approved policy or guidance to assist in determining significance at the project or cumulative level. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific project represents new emissions or existing, displaced emissions. Notwithstanding, as discussed above, the Proposed Project would contribute to GHG reductions and would therefore support State goals for emissions reduction. In addition, the Proposed Project would be consistent with the approach outlined in the California Air Resources Board's *Climate Change Scoping Plan*, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. The location and design of the Proposed Project reflect and support these core objectives. In addition, as recommended by the California Air Resources Board's *Climate Change Scoping Plan*, the Proposed Project would use green building features as a framework for achieving emissions reductions. Given the Proposed Project's consistency with State and City GHG emission reduction goals and objectives, the contribution to the cumulative impact of global climate change would be less than significant.

### c. Mitigation Measures

With implementation of project design features and code compliance measures, impacts related to climate change would be less than significant, and no mitigation measures are recommended or required.

### d. Level of Significance After Mitigation

With implementation of the Proposed Project's design features, code compliance measures, and compliance with State mandates, impacts with regards to climate change would be less than significant.

## D. Historic Resources

### a. Project Impacts

The Proposed Project would demolish the Van Ness Avenue guard station and a 77-square-foot restroom, neither of which are historic resources. In addition, the Proposed Project would demolish the scenic shop, also known as Building 14, which is a portion of the original Mill Building that was constructed sometime in the 1920s. In 1956, the original Mill Building was divided and the two portions were relocated to other areas of the lot. Building 14 survives today as a remnant of the original Mill Building. Building 14 is not considered to be individually significant, and demolition of Building 14 would not result in the demolition of an individually significant historic resource. However, Building 14 is considered to be a contributor to the potential historic district on the SBS campus, and demolition of Building 14 would reduce the total number of contributing resources on the property. Notwithstanding, since Building 14 represents only a small portion of the original Mill Building that was relocated after the period of significance, it is not critical to retaining the significance of the potential historic district. In addition, the SBS campus would still contain a concentration of buildings and structures dating from the period of significance after the demolition of Building 14, as well as the remaining spatial relationships and circulation patterns. Therefore, the SBS campus would continue to be eligible for National, State and local listing after demolition of Building 14. Thus, the Proposed Project does not involve the demolition of a significant historic resource, and as a result, impacts associated with demolition would be less than significant.

The Proposed Project would also relocate the KTLA Tower from its current location at the northeast corner of the Project Site to its original location in front of the western side of the EOB. Therefore, the Proposed Project has the potential to enhance the integrity of the KTLA Tower and the potential historic district character of the SBS campus. Similarly, the Proposed Project would maintain the integrity of all other individually significant historic resources on the property, and maintain the integrity of the property itself, as no other buildings or structures would be relocated as part of the Proposed Project. As such, potential impacts associated with relocation of a historic resource would be less than significant.

Additionally, the functionality of the rehabilitated structures (the Gene Autry Wing, the northern addition to the EOB, and the KTLA Tower) would remain in their current capacity, with the EOB continuing to be used for office space and the KTLA Tower continuing to serve as an ornamental visual historic element of the Project Site. Therefore, no portion of the Proposed Project has the potential to involve conversion, rehabilitation or alteration of a significant historic resource which does not meet the Secretary of the Interior's Standards, and as a result, impacts associated with conformance with the Secretary of the Interior Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings would be less than significant.

Further, while the construction of the proposed office building and parking structure would substantially change the Van Ness Avenue façade of the SBS campus, this area of the SBS campus, however, has been substantially altered since the period of significance as several original buildings have been demolished and replaced with a surface parking area. Therefore, the Van Ness Avenue façade of the SBS campus does not significantly contribute to the property's historic significance. In addition, the proposed new development, although adding considerable height and density, would not substantially impact the integrity of the SBS campus. Rather, the Proposed Project would complete the perimeter enclosure of the property along Van Ness Avenue, either by walls or building façades, which is a character-defining feature of motion picture studios from the studio era. Therefore, the Proposed Project would not materially impair the historic district resources on the SBS campus and a less than significant impact would result.

In addition, the Proposed Project would include setting the proposed office building back from Sunset Boulevard at a distance equal to the setback of the EOB. This setback would ensure that sightlines to the EOB from Sunset Boulevard are preserved and would therefore preserve the SBS campus' most important and character-defining façade (the EOB facing Sunset Boulevard), which was specifically constructed by Warner Brothers to create a memorable public face for the studio. As a result, the new office building would not materially affect the EOB's ability to convey its historic significance and impacts would be less than significant.

Finally, while construction of the Proposed Project has the potential to damage on-site historic resources due to underground excavation (i.e., settlement due to the removal of adjacent soil) and general construction procedures, implementation of Mitigation Measure D-1, provided below, would ensure the protection of adjacent historic resources during construction. With implementation of this mitigation measure, potentially significant impacts to historic resources during construction would be reduced to a less than significant level.

### b. Cumulative Impacts

As described above, alterations to the EOB and KTLA Tower would comply with the Secretary of the Interiors' Standards for the Treatment of Historic Properties, which would reduce any potential impacts to a less than significant level. Moreover, the alterations to the KTLA Tower and the EOB can be considered beneficial impacts as the alterations are returning the structures to original locations and architectural form, respectively. In addition, a mitigation measure requiring a shoring plan would protect historic structures on the Project Site from potential damage that could occur during construction. Furthermore, the Proposed Project would not adversely affect any historic resources that are located beyond the boundary of the Project Site or the SBS campus generally. Thus, when assessed in the context of other related projects, the Proposed Project would not considerably contribute to any potential cumulative impacts to historic resources. Therefore, the Proposed Project would result in a less than significant cumulative impact to historic resources.

### c. Mitigation Measures

To preclude any significant impacts during construction, the following mitigation measure would be implemented:

**Mitigation Measure D-1:** A shoring plan shall be implemented to ensure the protection of adjacent historic resources during construction from damage due to underground excavation, general construction procedures and to mitigate the possibility of settlement due to the removal of adjacent soil.

### d. Level of Significance After Mitigation

The project design features and mitigation measure set forth above would reduce the potential impacts associated with historic resources to a less than significant level.

## E. Land Use

### a. Project Impacts

#### *(1) Land Use Consistency*

##### *(a) City of Los Angeles General Plan*

The Proposed Project would support the General Plan Framework Element as it would assist in improving the jobs and housing relationships in sub-areas of the City by

introducing additional media and entertainment-related uses to a Project Site historically occupied with such uses and by drawing on the unique and established entertainment-related skill set of employees and residents in the Hollywood area. By expanding media and entertainment-related uses in the Hollywood area on a previously developed site in an urbanized portion of the City that is located in close proximity to several mass transit options, including the Metro Hollywood/Western Red Line station, the Proposed Project would achieve the General Plan Framework's goal to reduce impacts on the environment by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution. In addition, by drawing on the synergy created by locating entertainment-related uses in a concentrated area and respecting historic structures that are unique to the entertainment industry in Los Angeles, the Proposed Project would facilitate the local community's identity and foster economic growth of the entertainment industry.

The Proposed Project would also be compatible with the goals of the Urban Form and Neighborhood Design Chapter to create a livable City for existing and future residents and one that is attractive to future investment. Specifically, the Proposed Project represents an investment in new entertainment-related development featuring landscaping and setback areas and modern amenities. In addition, by improving the streetscapes along Sunset Boulevard and Van Ness Avenue, the Proposed Project would improve the pedestrian streetscape of the Project vicinity. Furthermore, while the Proposed Project's landscaping and open space areas would be restricted to on-site employees and visitors, the provision of this space would reduce the Proposed Project's demand for public park services. Additionally, the landscaped areas along Sunset Boulevard and Van Ness Avenue would result in a more aesthetically appealing streetscape along these roadways when compared to existing conditions. Therefore, the Proposed Project would be generally consistent with the intent of the Open Space and Conservation Chapter.

In addition, the Proposed Project would be consistent with the Economic Development Chapter's goal to achieve a City with land appropriately and sufficiently designated to sustain a robust commercial and industrial base. In particular, the Proposed Project would restore studio-related uses to a Project Site that is zoned for such uses, with a corresponding land use zoning of M1-1 (Limited Industrial). The Proposed Project would also meet the goal of establishing a balance of land uses that provides for commercial and industrial development and meets the needs of local residents by fostering continued entertainment-related economic growth in an area of the City that is historically known for entertainment uses and contains a high concentration of employees specializing in the entertainment field. Further, the Proposed Project would meet the goal to encourage new development in proximity to rail and bus transit corridors as the Project Site is located along Sunset Boulevard, a major transit thoroughfare.

Overall, the Proposed Project would be generally consistent with the policies and objectives set forth in the General Plan Framework Element. Similarly, the Proposed Project would also be consistent with the applicable policies contained in the Transportation Element and the Air Quality Element of the City's General Plan.

*(b) Hollywood Community Plan*

As discussed in Section IV.E, Land Use, of the Draft EIR, a key objective of the Hollywood Community Plan is to encourage the development of the types of industry that are indigenous to the Hollywood area (e.g., motion picture and television production, radio studios, sound and recording studios, film processing studios, and motion picture manufacturing and distribution) on lands designated in the Community Plan as Industrial. Similarly, another Community Plan objective is "to promote economic well being and public convenience through encouraging the revitalization of the motion picture industry." As the Proposed Project would restore studio-related uses to a site that is designated for Limited Manufacturing, an industrial use, in the Community Plan, the Proposed Project would be consistent with these objectives of the Community Plan. Indeed, the welfare of the Hollywood community is based largely on the long-standing economic contribution and development of entertainment industry, especially along Sunset Boulevard where the Project Site is located. In this way, the Proposed Project is developing a project to meet the evolving needs of the entertainment industry, which has been vital to the character, economic health, and social identity of Hollywood.

Additionally, with implementation of the Proposed Project's Class-A office space, modern studio production office facilities and streetscape and landscaping improvements, the Proposed Project would also be consistent with the Community Plan objectives, including "to further the development of Hollywood as a major center of population, employment, retail services, and entertainment; and to perpetuate its image as the international center of the motion picture industry." In addition, by renovating historic structures and integrating them within the context of new development, the Proposed Project would represent a positive contribution to the urban elements of the surrounding cityscape. Further, the height and mass of the proposed buildings would be consistent with existing development along Sunset Boulevard in the vicinity, including the Metropolitan Residential Tower across Sunset Boulevard. Thus, the Proposed Project would foster community revitalization by developing an underutilized site with uses that are compatible with the surrounding community, the Proposed Project would be consistent with the Hollywood Community Plan objectives to preserve valuable land resources from the intrusion of other uses, and ensure its development with high quality industrial uses in keeping with the urban residential character of the community. Overall, the Proposed Project would be generally consistent with the objectives and policies set forth in the Hollywood Community Plan.

*(c) Hollywood Community Plan Update*

Under the Hollywood Community Plan Update, the land use designation and zoning of the Project Site would not change. The Proposed Project would be consistent with the majority of the goals and policies of the Hollywood Community Plan Update. The Hollywood Community Plan Update focuses on providing alternative modes of transportation and reducing reliance on automobiles, while respecting the existing neighborhoods in Hollywood. The Proposed Project would include studio/media/ entertainment-related uses in close proximity to transit opportunities and would include pedestrian and bicycle amenities, thereby reducing reliance on automobiles. In addition, the Proposed Project's studio/media/entertainment-related uses would be compatible in relation to surrounding development given their location within the SBS campus, which is currently developed with studio-related uses, and within Hollywood, the historic center of the entertainment industry.

The Proposed Project would also be consistent with the applicable objectives set forth in the Urban Design Guidelines of the Hollywood Community Plan Update. Specifically, the Proposed Project would locate the proposed 14-story office building within the northeast corner of the Project Site and establish a strong identity for the Sunset Boulevard/Van Ness Avenue corner in conjunction with the existing 12-story Metropolitan Residential Tower across Sunset Boulevard. In addition, the Proposed Project would locate the proposed five-story production office building near the center of the Project Site, immediately adjacent to the west side of the proposed parking structure, creating the visual appearance of a single building with a production office component and a parking component. Furthermore, the proposed landscaped areas along Sunset Boulevard and Van Ness Avenue would improve the pedestrian-friendly environments of these streetscapes. As such, the Proposed Project would be consistent with the building orientation and on-site open space objectives. Furthermore, with the implementation of attractive building façades and landscaping along the building setbacks, the Proposed Project would also support the landscaping objectives of the Urban Design Guidelines.

Additionally, the Proposed Project would be designed to provide visual interest, since all of the buildings would vary in height, bulk and massing, thus creating an identity that is distinctive yet compatible with surrounding uses. In addition, the Proposed Project's studio/ media/entertainment-related uses would be compatible with existing studio-related uses within the overall SBS campus and within Hollywood and would be in character with the surrounding area. Therefore, the Proposed Project would support the scale, height, and massing objectives of the Urban Design Guidelines. Furthermore, given the vehicular and pedestrian circulation improvements proposed as part of the Proposed Project, the Proposed Project would also be consistent with the pedestrian amenities objectives of the Urban Design Guidelines.

Lastly, the Proposed Project would include sustainability features and would be designed to exceed Title 24 baseline standard requirements for energy efficiency as well as meet LEED Silver certification and comply with the City's Green Building Ordinance. Thus, the Proposed Project would meet the sustainability objectives of the Urban Design Guidelines. Furthermore, the Proposed Project would be designed to be non-intrusive to on-site users by locating loading and trash collection facilities away from pedestrian areas. As such, the Proposed Project would also support the other building elements objectives of the Urban Design Guidelines.

Overall, based on the discussion above, the Proposed Project would be generally consistent with the goals and policies set forth in the Hollywood Community Plan Update.

*(d) Community Redevelopment Agency's Hollywood Redevelopment Plan*

As discussed further in Section IV.E, Land Use, of the Draft EIR, the Proposed Project would be consistent with the applicable goals and policies of the Community Redevelopment Plan. Specifically, the Proposed Project represents a private sector development that would expand upon the existing entertainment-related uses in the Hollywood area by providing studio/media/entertainment-related office uses. Additionally, by expanding such uses and respecting historic buildings in the vicinity, the Proposed Project would promote a positive image for Hollywood that recognizes the area as the center of the entertainment industry and a tourist destination. The Proposed Project would also foster community revitalization by renovating two historic buildings and developing an underutilized site with uses that are compatible with the adjacent educational, commercial and residential neighborhoods. Lastly, the Proposed Project would be located within close proximity to transit options and would provide adequate parking. Therefore, the Proposed Project would be consistent with the goals and policies of the Hollywood Redevelopment Plan.

*(e) Los Angeles Municipal Code*

The Project Site and SBS campus are currently improved with television and radio studio uses, which are permitted under the current zoning designation of M1-1 (Limited Industrial). As a zone change is not proposed as part of the Proposed Project, the proposed studio/media/entertainment-related uses would be consistent with the existing zoning and would not represent a change in use for the overall SBS campus and the Project Site. Furthermore, the Proposed Project would be within the maximum floor area ratio permitted for the Project Site. Specifically, the overall SBS campus is approximately 459,467 square feet in size and currently contains approximately 297,729 square feet of enclosed floor area. Under the current M1-1 zoning of the SBS campus, approximately 689,200 square feet of enclosed floor area is permitted on the SBS campus based on a floor area ratio of 1.5:1. The Proposed Project would result in the addition of approximately

391,018 square feet of net new building area. With this additional floor area, a total of approximately 688,747 square feet of floor area would be present within the overall SBS campus. As a result, the Proposed Project would not exceed the floor area permitted within the SBS campus.

With respect to setback regulations, buildings erected and used exclusively for commercial or industrial purposes in the M1 zone do not require front, side, or rear yard setbacks. However, pursuant to document number 1702, entitled *Covenant and Agreement Regarding Maintenance of yards for Oversized Buildings*, recorded with the Los Angeles County Recorder's Office on January 2, 1969, a yard of 60 feet in width must be maintained along Building No. 10 (Executive Office Building), located at the northwest corner of the Property and fronting Sunset Boulevard. The covenant only applies to Building No. 10 and does not affect setback requirements for the structures proposed as part of the Proposed Project. Accordingly, the Proposed Project complies with the applicable setback requirements. However, in an effort to respect historic resources in the vicinity and to improve the pedestrian streetscape along Sunset Boulevard, the Proposed Project would exceed the setback requirements of the M1 zone by providing a landscaped setback in front of the office building along Sunset Boulevard. Based on the preceding analysis, the Proposed Project would comply with LAMC requirements.

*(f) City of Los Angeles' Walkability Checklist*

The Proposed Project would implement numerous design elements that would create an accessible, safe, and visually appealing pedestrian environment, in accordance with the applicable objectives of the City's Walkability Checklist. In particular, with implementation of the Proposed Project, pedestrian safety would be enhanced at the Van Ness Gate by creating a longer queuing area for entering and exiting vehicles. In addition, sidewalks would be provided along each side of the driveway rather than the current configuration, with the perimeter wall immediately adjacent to the driving surface. These modifications would improve visibility and provide pedestrian paths outside of the traffic lanes. Further, the landscaped areas along Sunset Boulevard and near the Van Ness Gate, as well as landscaping along Van Ness Avenue in front of the proposed parking structure, would result in a more aesthetically appealing streetscape along these roadways when compared to existing conditions. The Proposed Project would also provide proper lighting of parking structures, elevators, and lobbies to reduce areas of concealment; lighting of building entries and pedestrian walkways to provide for pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into buildings. Pedestrian entrances also would be fully configured such that the entrance would be ADA-accessible. Additionally, the proposed parking structure would be connected to the proposed office tower through an underground driveway and passageway for pedestrians.

Consistent with the building façade objectives, goals, and implementation strategies set forth in the Walkability Checklist, the proposed office building would respect the scale and design of existing historic structures by incorporating complementary design elements into the new buildings. In addition, the Proposed Project would incorporate various elements to promote individual and community safety including proper lighting of parking structures, elevators, and lobbies to reduce areas of concealment. Furthermore, proposed signage would include monument signage, building and tenant signage, and general ground level and wayfinding pedestrian signage, as permitted per the CRA's Design for Development for Signs in Hollywood. In addition, the long façade of the parking structure would be punctuated by graphic screens with printed content that may feature shows filming on site, the identity of prominent tenants such as KTLA 5, or artistic and historical images conveying the legacy of the long-standing studio. The Proposed Project would not include any off-premises billboard advertising. Proposed Project lighting would include low-level exterior lights adjacent to buildings and along pathways for security and wayfinding purposes. Accordingly, the Proposed Project would comply with the applicable principles presented in the City's Walkability Checklist.

*(g) Citywide Design Guidelines*

The Proposed Project would support the objectives of the Citywide Design Guidelines as it would implement landscaping improvements within and along the boundaries of the Project Site, including landscaping along Sunset Boulevard and Van Ness avenue, which would improve the Project Site's visual character from area roadways when compared to existing conditions. In addition, by locating studio-related uses in an area with a high concentration of similar and supportive uses, the Proposed Project would further build on the identity of the Hollywood area as the heart of the City's entertainment industry. Furthermore, the height and mass of the proposed buildings would be consistent with existing development including the Helen Bernstein High School across Van Ness Avenue and the Metropolitan Residential Tower across Sunset Boulevard. Overall, as further detailed in Section IV.E, Land Use, of the Draft EIR, the Proposed Project would be generally consistent with the objectives set forth in the Citywide Design Guidelines.

*(h) City of Los Angeles State Enterprise Zone*

The Project Site is located within the Hollywood region of the City State Enterprise Zone (EZ), and thus the Proposed Project would be eligible for many of the incentives offered by the City. As stated above, the goal of the incentives is to stimulate increased employment opportunities, business attraction, and investment in economically disadvantaged areas. Implementation of the Proposed Project would help revitalize the neighborhood by creating an economically viable entertainment-related development on an underutilized site. Thus, the Proposed Project would be consistent with the City's intent for the Los Angeles EZ.

*(i) Southern California Association of Governments Regional Transportation Plan and Growth Vision Report*

The six main goals of the Southern California Association of Government's (SCAG) Regional Transportation Plan (RTP) aim to maximize mobility and accessibility for all people and goods in the region; ensure travel safety and reliability for all people and goods in the region; preserve and ensure a sustainable regional transportation system; maximize the productivity of our transportation system; protect the environment, improve air quality and promote energy efficiency; encourage land use and growth patterns that complement our transportation investments and improve the cost-effectiveness of expenditures; and maximize the security of our transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies. Section IV.E, Land Use, of the Draft EIR, provides an analysis of the Proposed Project's consistency with the applicable goals and polices in SCAG's 2008 RTP. As indicated therein, the Proposed Project would support applicable policies set forth in SCAG's 2008 RTP.

The four principles within SCAG's Growth Vision Report are intended to promote and maximize regional mobility, livability, prosperity and sustainability. Decisions regarding growth, transportation, land use and economic development should support and be guided by these principles. As demonstrated within Section IV.E, Land Use, of the Draft EIR, the Proposed Project would be generally consistent with the Growth Vision Report.

*(j) Southern California Air Quality Management District Air Quality Management Plan and Metro Congestion Management Program*

The air quality impacts associated with the Proposed Project relative to the Air Quality Management Plan are evaluated in Section IV.B, Air Quality, of the Draft EIR. As discussed therein, the Proposed Project would be consistent with the Air Quality Management Plan. In addition, as discussed in Section IV.G, Traffic, Access, and Parking, of the Draft EIR, implementation of the Proposed Project would not conflict with the Congestion Management Program (CMP) as it would not exceed CMP thresholds at any CMP intersection or freeway monitoring location.

*(2) Land Use Compatibility*

With the development of new studio/media/entertainment-related uses within the Project Site, the Proposed Project would contribute to the reputation of Hollywood as the historic center of the entertainment industry and would also be compatible with the varied land uses surrounding the Project Site. Specifically, the Project Site is located within the SBS campus, with on-going daily studio operations. Additionally, supporting uses for film and television studios, such as post-production facilities and wardrobe services, are located throughout the area. In addition, the Proposed Project would not interfere with, or

encroach upon, or hinder the existing uses of the Helen Bernstein High School located east across Van Ness Avenue. Furthermore, the uses and structures immediately adjacent to the south and west sides of the Project Site are existing studio-related facilities. The other surrounding off-site uses to the south and west are several hundred feet away from the Project Site and are buffered by the existing studio facilities on the SBS campus.

Additionally, the Proposed Project would incorporate a site design in which, although the parking structure would be visible from Van Ness Avenue, the façade of the parking structure would be comprised of decorative treatments and complementary paint colors. Landscaping would also be included along Van Ness Avenue in front of the parking structure and would include mature trees. As such, the proposed parking structure would be compatible with the surrounding environment. The Proposed Project would also include landscaping and a setback along Sunset Boulevard, as well as landscaping along the Van Ness Gate to improve the pedestrian streetscape along these roadways and improve the quality of life for area residents, employees, shoppers, and visitors. Such improvements would create a pedestrian-friendly environment that would enhance the visual character of the Project Site and surrounding streetscape and promote compatibility with adjacent uses. In addition, based on the heights of existing buildings within the immediate Project Site vicinity and beyond, the Proposed Project would not contrast sharply with existing surrounding development or other more distant properties. In addition, the Proposed Project's increase in density and building height would be in character with the area given the nature of other high-density development throughout the vicinity, including the 12-story Metropolitan Residential Tower across Sunset Boulevard. Furthermore, the Proposed Project would be designed to provide visual interest since the proposed buildings would vary in height, bulk and massing, thus creating an identity that is distinctive yet compatible with surrounding uses. As such, the Proposed Project design would be consistent with the size, intensity, density, and scale of nearby development.

With regard to disrupting, dividing, or isolating an existing community, the Proposed Project is developing additional studio/media/entertainment-related uses within the existing SBS campus. The SBS campus, with its on-going daily studio operations, is a part of the existing community and the addition of production offices and a parking structure within the campus would not interfere with, or encroach upon, the surrounding facilities or hinder the existing uses of the community. As such, the Proposed Project would not disrupt, divide, or isolate an existing community. Further, the Proposed Project would be developed within a long-established urban area along an existing street grid system. Thus, the Proposed Project would not physically divide an established community by creating new streets or by blocking or changing the existing street grid pattern. Therefore, the Proposed Project would not disrupt, divide, or isolate any existing neighborhoods or communities.

Based on the above, the Proposed Project would not substantially or adversely change the existing relationship between on- and off-site land uses and properties, or have the long-term effect of adversely altering a neighborhood or community through ongoing disruption, division, or isolation. As such, Proposed Project impacts related to land use compatibility would be less than significant.

### b. Cumulative Impacts

As with the Proposed Project, the related projects would be required to comply with relevant land use policies and regulations. Therefore, as the Proposed Project would generally be consistent with applicable land use plans, the Proposed Project would not incrementally contribute to cumulative inconsistencies with respect to land use plans. Thus, cumulative impacts on the regulatory framework would be less than significant.

While the Proposed Project in combination with the related projects represents a continuing trend of infill development at increased densities, they also would serve to modernize the area and provide sufficient infrastructure and amenities to serve the growing population. Therefore, the related projects are not expected to fundamentally alter the existing land use relationships in the community, but rather would concentrate development on particular sites and promote a synergy between existing and new uses. In addition, as analyzed above, the proposed studio/media/entertainment-related uses would be compatible with surrounding land uses. Thus, the Proposed Project would not have a cumulatively considerable impact on land use compatibility. As such, the combined land use compatibility impacts associated with the Proposed Project's incremental effect and the effects of other related projects would be less than significant.

### c. Mitigation Measures

Based on the above analysis, with incorporation of project design features as set forth throughout the Draft EIR, and approval of the proposed discretionary permits and requests, the Proposed Project would be generally consistent with applicable land use plans, policies, and regulations. In addition, the Proposed Project would not disrupt or divide an established community. Thus, no mitigation measures would be required.

### d. Level of Significance After Mitigation

Impacts related to land use would be less than significant, and, therefore, no mitigation measures would be required.

# F. Noise

## a. Project Impacts

### *(1) Construction Noise*

Noise impacts from Proposed Project construction activities occurring within or adjacent to the Project Site would be a function of the noise generated by construction equipment, the location of the equipment, the timing and duration of the noise-generating construction activities, and the relative distance to noise sensitive receptors.

The estimated construction noise levels at the Helen Bernstein High School (receptor R1) outdoor athletic fields would exceed the significance threshold by up to 16 dBA, which would result in a significant impact. The Helen Bernstein High School classroom buildings are located further from the Project Site and would be exposed to reduced construction noise levels than at the outdoor athletic field. The estimated noise levels outside of the Helen Bernstein High School classroom buildings, however, would exceed the significance threshold by a maximum of 2 dBA. However, with implementation of Mitigation Measure F-1 provided below, the construction noise levels at the classroom buildings would be reduced to a less than significant level.

The estimated construction-related noise levels at receptors R2 (Joseph Le Conte Middle School), R3 (residence at 1449 Bronson Avenue), and R4 (multi-family residence on the south side of Harold Way) would be below the significance thresholds for all construction phases. However, at receptor R5 (St. Moritz Hotel and the Metropolitan Residential Tower), the construction-related noise levels would be below the significance threshold for all construction phases, except during the foundation phase where noise levels would exceed the significance threshold by 1 dBA at the St. Moritz Hotel and by up to 7 dBA at the Metropolitan Residential Tower. Therefore, significant noise impacts have the potential to occur. However, with implementation of the mitigation measures provided below, such impacts would be reduced to a less than significant level.

In addition to on-site construction noise sources, off-site construction noise sources include delivery, concrete mix, and haul trucks, and construction worker vehicles. Construction-related delivery/haul trucks would generate noise levels up to 63 dBA (hourly $L_{eq}$) along the construction haul routes (i.e., Van Ness Avenue and Sunset Boulevard toward the US-101 Freeway), which would be consistent with the existing daytime ambient noise levels (based on ambient noise measurements at receptor R1 and R5). The estimated delivery/haul trucks noise levels represent the maximum delivery/haul trucks operation, which would occur during the foundation phase. During other construction stages, the number of haul or delivery trucks would be reduced, which would result in

reduced noise levels. Therefore, the estimated noise level due to delivery/haul truck movements would not exceed the significance threshold and significant noise impacts from off-site construction traffic would not be expected.

*(2) Construction Vibration*

The Proposed Project would generate ground-borne construction vibration during site demolition and grading activities where heavy construction equipment, such as large bulldozers, would be used. Vibration velocities from most heavy construction equipment operations that would be used during construction of the Proposed Project would range from 0.003 to 0.089 inch per second PPV at a distance of 25 feet from the equipment. The estimated vibration velocity levels at a distance of 25 feet would be below the most stringent significance threshold of 0.12 inch/second PPV (applicable to historic buildings) for most equipment. In addition, Mitigation Measure F-7 would be implemented to ensure that construction activities adjacent to the Executive Office Building would not affect the structural integrity of the building. Therefore, vibration impacts associated with potential building damage during construction would be less than significant.

Haul trucks during construction would also generate ground-borne vibration as they travel along the Proposed Project designated haul routes. A loaded truck traveling on a rough road surface would generate a ground-borne vibration level of 0.076 inch per second PPV at a distance of 25 feet from the truck movements. There are buildings located along the proposed haul route that would be exposed to vibration levels of up to 0.076 inch per second PPV from the haul truck movements. The estimated ground-borne vibration level of 0.076 inch per second PPV due to these haul truck movements would be well below the more stringent building damage threshold of 0.12 inch per second PPV. Thus, potential building damage impacts associated with vibration from haul trucks during construction would be less than significant.

*(3) Operational Noise*

Primary noise sources associated with operation of the Proposed Project would include building mechanical equipment, parking facilities, loading dock, and traffic on nearby roadways. The Proposed Project is estimated to increase the ambient sound level at the off-site noise-sensitive receptors by approximately 0.6 dBA (CNEL) at receptor R4 to a maximum of approximately 2.1 dBA (CNEL) at receptor R1, relative to the existing ambient noise environment. The estimated increases would be below the 3-dBA significance threshold. As such, the composite noise level (noise level from all of the Proposed Project's noise sources) impacts due to Proposed Project operations would be less than significant.

## b. Cumulative Impacts

### *(1) Construction Noise and Vibration*

Noise from construction of development projects is typically localized and has the potential to affect areas immediately within 500 feet from the construction site. Thus, noise from construction activities for two projects within 1,000 feet of each other can contribute to a cumulative noise impact for receptors located midway between the two construction sites. While the majority of the related projects are located a substantial distance from the Project Site, there are two related projects within 1,000 feet of the Project Site, including Related Project No. 28, a mixed-use development project located at 5935-5939 West Sunset Boulevard, approximately 330 feet northwest of the Project Site, and Related Project No. 29, the Emerson College Los Angeles Center located at 1460 North Gordon Street approximately 475 feet west of the Project Site. Based on the locations of these related projects relative to the Project Site, receptors R3 (residence at 1449 Bronson Avenue) and R5 (St. Moritz Hotel and the Metropolitan Residential Tower) were evaluated for potential cumulative noise impacts. As evaluated in Section IV.F, Noise, of the Draft EIR, the noise attenuation due to distance and intervening structures between the Project Site, the two related projects, and receptor R3, would preclude a cumulative impact at receptor R3 and nearby noise-sensitive uses. With regard to potential cumulative noise impacts at receptor R5, construction of the Proposed Project together with construction of Related Project No. 28 could contribute to a cumulative noise impact at receptor R5. Noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures for each individual related project and compliance with time restrictions and other relevant provisions in the City's Municipal Code. Nonetheless, it is conservatively concluded that if Related Project No. 28 were to be constructed concurrent with the Proposed Project, cumulative construction noise impacts would be significant at receptor R5.

Potential vibration impacts due to construction activities are generally limited to buildings/structures that are located in close proximity of the construction site (i.e., within 25 feet from the heavy construction equipment). The nearest related project (Related Project No. 28) is approximately 330 feet from the Project Site. Therefore, due to the rapid attenuation characteristics of groundborne vibration, there is no potential for a cumulative construction impact with respect to groundborne vibration.

### *(2) Long-Term Operations*

Due to provisions in the local municipal codes that limit stationary-source noise from items such as roof-top mechanical equipment, noise levels would be less than significant at the property line for each related project. In addition, as the Proposed Project's on-site stationary-source noise impacts would result in less than significant impacts, noise impacts

from stationary-sources attributable to cumulative development of the related projects and the Proposed Project would also result in less than significant impacts.

The Proposed Project and other related development in the area would produce traffic volumes (off-site mobile sources) that would generate roadway noise. The estimated cumulative noise levels at all analyzed roadway segments would be below the more stringent 3-dBA significance threshold, except for the Bronson Avenue roadway segment between Sunset Boulevard and just north of Hollywood Boulevard. The cumulative traffic volumes would result in a maximum increase of 3.6 dBA CNEL along this roadway segment. Although the noise contribution from Proposed Project-related traffic would be less than 0.5 dBA CNEL, cumulative noise impacts due to off-site mobile noise sources (vehicular traffic from the Proposed Project and related projects) would be significant. Conventional mitigation measures, such as construction of noise barrier walls to reduce the off-site traffic noise impacts would not be feasible as the barriers would obstruct the access to the residential properties. Therefore, as there are no feasible mitigation measures to reduce the off-site traffic noise impacts, the cumulative operation noise impacts would remain significant and unavoidable.

## c. Mitigation Measures

### *(1) Construction*

Construction-related noise has the potential to result in significant impacts at sensitive receptors. Thus, the following measures are included to minimize construction-related noise impacts:

**Mitigation Measure F-1:** A temporary and impermeable sound barrier shall be erected in the following locations:

- Along the eastern property line of the Project Site between the construction area and Helen Bernstein High School. The temporary sound barrier shall be designed to provide a 16-dBA noise reduction.
- Along the northern property line of the Project Site between the construction area and the St. Moritz Hotel and the Metropolitan Residential Tower. The temporary sound barrier shall be designed to provide a minimum 8-dBA noise reduction.

**Mitigation Measure F-2:** Exterior noise generating construction activities shall be limited to Monday through Friday from 7:00 A.M. to 9:00 P.M., and from 8:00 A.M. to 6:00 P.M. on Saturdays. No construction activities shall occur on Sundays or any national holidays.

**Mitigation Measure F-3:** Power construction equipment shall be equipped with state-of-the-art noise shielding and muffling devices. All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts would be generated.

**Mitigation Measure F-4:** Stationary source equipment that is flexible with regard to relocation (e.g., generators and compressors) shall be located so as to maintain the greatest distance from sensitive land uses and unnecessary idling of such equipment shall be prohibited.

**Mitigation Measure F-5:** Loading and unloading of heavy construction materials shall be located on-site and away from noise-sensitive uses, to the extent feasible.

**Mitigation Measure F-6:** Engine idling from construction equipment such as bulldozers and haul trucks shall be limited. Idling of haul trucks shall be limited to five (5) minutes at any given location as established by the South Coast Air Quality Management District.

**Mitigation Measure F-7:** The Applicant shall retain the services of a qualified vibration consultant to develop and implement a vibration monitoring program to ensure that Project-related construction activities do not adversely affect the structural integrity of the Executive Office Building.

*(2) Operation*

As discussed above, operation of the Proposed Project would not result in a significant impact to the off-site noise sensitive receptors. Therefore, no mitigation measures would be required. The traffic volumes from the Proposed Project and the related projects would result in a significant impact for noise-sensitive receptors along the Bronson Avenue roadway segment between Sunset Boulevard and just north of Hollywood Boulevard. However, conventional mitigation measures, such as construction of noise barrier walls to reduce the off-site traffic noise impacts would not be feasible as the barriers would obstruct access to residential properties.

## d. Level of Significance after Mitigation

*(1) Construction*

Implementation of Mitigation Measure F-1 would reduce the construction-related noise at receptor R1 (Helen Bernstein High School) from 72 dBA to 62 dBA at the outside of the classroom building and from 86 dBA to 70 dBA at the athletic field. In addition, Mitigation Measure F-1 would reduce construction-related noise at the St. Moritz Hotel from 77 dBA to 69 dBA and at the Metropolitan Residential Tower from 83 dBA to 75 dBA. Thus, Project-related construction noise impacts at the nearby receptors would be reduced

to less than significant levels. The estimated construction-related noise reductions attributable to Mitigation Measures F-2 through F-6, although not easily quantifiable, would also ensure the noise impacts associated with construction activities would be reduced to the extent practicable. Therefore implementation of the required noise mitigation measures would reduce the construction-related noise to a less than significant level at the off-site noise sensitive receptors. However, cumulative construction noise impacts would remain significant and unavoidable even with implementation of mitigation measures.

*(2) Operation*

The Proposed Project would not contribute any significant noise impacts to off-site noise sensitive receptors during long-term Proposed Project operations. Therefore, operational noise impacts would be less than significant. As discussed above, there are no feasible mitigation measures to reduce the off-site traffic noise impacts. Therefore, the cumulative operational noise impacts would remain significant and unavoidable.

## G. Traffic, Access, and Parking

### a. Project Impacts

*(1) Construction*

Traffic delays from additional construction traffic and/or construction activities at other locations are not expected to be substantial especially since the Project Site is directly accessible from the US-101 via Sunset Boulevard. In addition, while it would be necessary to conduct some construction activities within the Van Ness Avenue right-of-way, which could temporarily affect traffic on the through segment of Van Ness Avenue adjacent to the Project Site as well as the intersection of Van Ness Avenue and Sunset Boulevard, construction of the Proposed Project would not be expected to significantly impact any of the 20 study intersections under either Existing (2012) or Future (2016) conditions. In addition, the proposed delivery/haul routes would primarily use Sunset Boulevard to access the US-101. Sunset Boulevard is classified as a Major Highway Class II in the City of Los Angeles' General Circulation Plan and is designed to accommodate the estimated level of truck traffic.

With regard to potential hazardous conditions, Proposed Project construction is not expected to create hazards for roadway travelers, so long as commonly practiced safety procedures for construction are followed. In addition, potential impacts associated with partial lane/sidewalk closures would be limited to those locations immediately adjacent to the Project Site. Specifically, development facing Van Ness Avenue could have short-term impacts during the reconstruction of the Van Ness Gate and the installation of two new

driveways along Van Ness Avenue. Additionally, due to the limited space within the SBS campus, it would be necessary to conduct some construction activities within the Van Ness Avenue right-of-way. The limits of the construction area would be along the west sidewalk area and adjacent parking lane from the north side of the Van Ness Gate to the south side of the Van Ness service gate. Construction activities would include the loading and removal of demolition debris, material deliveries with associated staging and lay-down activities, and the basing and operation of construction cranes. Such activities could create a potential hazardous condition for travelers along Van Ness Avenue. However, with implementation of Mitigation Measures G-1 through G-6, provided below, the potential for hazardous traffic conditions along Van Ness Avenue resulting from construction activities associated with the Proposed Project would be reduced to less than significant.

Additionally, as evaluated in Section IV.G, Traffic, Access, and Parking, of the Draft EIR, the Helen Bernstein High School would be located along one of the proposed delivery/haul truck routes if delivery/haul trucks were to exit the Project Site along Van Ness Avenue. In addition, the on-street construction activities that would occur within the Van Ness Avenue right-of-way could potentially impact Helen Bernstein High School drop-off zone operations and safety. However, the majority of the Helen Bernstein High School buildings are located on the southeastern portion of the school site with only the athletic fields located on the northwest corner, near the proposed delivery/haul truck route. In addition, the school's athletic facilities are separated from Sunset Boulevard and Van Ness Avenue by a chain-link fence, while the school's main driveway and drop-off/pick-up zone are located south of the proposed delivery/haul truck route segment along Van Ness Avenue (i.e., opposite vacated Fernwood Avenue). Furthermore, Mitigation Measures G-1 through G-6 provided below would be implemented to require that the construction area within the public right-of-way not extend beyond the limits as described above and ensure that a through lane in each direction is maintained for regular public use at all times during construction. As such, due to the separation of the school facilities from the proposed delivery/haul truck route and proposed construction area along Van Ness Avenue and with implementation of Mitigation Measures G-1 through G-6, no significant school safety impacts would be expected to occur due to Proposed Project construction activities.

Construction of the Proposed Project would result in the removal of 401 parking spaces within the surface parking lot that comprises most of the Project Site. However, parking that would normally occur in this surface parking lot would be temporarily relocated to the two off-site parking facilities owned by the Applicant. If additional parking is needed, the Applicant would lease an off-site parking facility within a quarter mile of the Project Site. As such, it is anticipated that an adequate number of parking spaces for SBS campus operations would be available at all times during construction. Additionally, while the removal of adjacent on-street parking spaces along Van Ness Avenue would reduce the availability of on-street parking, such reduction would be temporary and would not be

significant in the context of the on-street parking availability in the area. Therefore, the temporary removal of these parking spaces is not considered a significant impact.

Overall, the impact on the transportation system from construction activities would be temporary in nature and would cause an intermittent reduction in street and intersection operating capacity to adjacent uses near the Project Site. With implementation of the mitigation measures included below, traffic impacts during construction of the Proposed Project would be less than significant.

*(2) Operation*

*(a) Intersections*

Future With Project Traffic Conditions

The Proposed Project is projected to generate approximately 2,690 daily trips, including 404 A.M. peak-hour trips and 378 P.M. peak-hour trips. Of the 20 intersections analyzed, prior to mitigation, the Proposed Project would result in significant traffic impacts at the following seven intersections during either the A.M. or P.M. peak hour:

6. Bronson Avenue & Hollywood Boulevard (P.M. peak hour)
7. Bronson Avenue & Sunset Boulevard (P.M. peak hour)
12. Van Ness Avenue & Sunset Boulevard (P.M. peak hour)
13. Van Ness Avenue & Santa Monica Boulevard (P.M. peak hour)
14. Wilton Place & Sunset Boulevard (A.M. peak hour)
15. Western Avenue & Hollywood Boulevard (A.M. peak hour)
16. Western Avenue & Sunset Boulevard (A.M. peak hour)

Mitigation measures to reduce potential impacts to these seven intersections are discussed below.

Existing With Project Traffic Conditions

Of the 20 intersections analyzed, prior to mitigation, the Proposed Project would result in significant traffic impacts at the following intersection:

12. Van Ness Avenue & Sunset Boulevard (P.M. peak hour)

As provided above, this intersection would also be significantly impacted by the Proposed Project under "Future With Project Traffic Conditions." As such, a mitigation measure to reduce potential impacts at this intersection is also provided below.

*(b) Regional Transportation System*

The nearest arterial CMP monitoring station is located on Santa Monica Boulevard at Western Avenue, southeast of the Project Site. As this location is already a study intersection (Intersection No. 18), and the LADOT-required analysis provided above is more conservative than the CMP methodology, impacts identified in this analysis for that intersection supersede the CMP requirements. An additional arterial CMP monitoring station is located on Santa Monica Boulevard at Highland Avenue, approximately 1.25 miles southwest of the Project Site. Based on the reduction in development of the Proposed Project compared to the project analyzed in the 2006 Traffic Report and additional dispersal of Proposed Project traffic, the trips on Santa Monica Boulevard would be reduced to less than 50 peak hour trips under the Proposed Project. In addition, cars are anticipated to use Santa Monica Boulevard as a connection to other area streets along approximately one mile of Santa Monica Boulevard prior to the Highland Avenue intersection. Therefore, the Proposed Project would not meet or exceed the trip thresholds at any CMP monitoring intersections, and no detailed CMP intersection analyses are warranted.

Additionally, net new traffic additions to the freeways near the Project Site would not exceed the 150-vehicle-per-hour directional thresholds identified in the CMP, and therefore, do not trigger the need for detailed freeway analyses under the CMP. While a formal analysis of freeway impacts was not warranted, a brief assessment of the potential freeway impacts was conducted as part of the Traffic Study. In accordance with guidelines established in the CMP, a significant impact would be identified if the demand-to-capacity ratio increases by 0.020 or greater, and the final "With Project" Level of Service is LOS F. As the subject freeway segments each provide a total capacity of between 8,000 and 10,000 vehicles per hour, an increase of 0.020 or more in the demand-to-capacity ratio equates to the addition of between 160 and 200 vehicles per hour during the peak hours. The total trips upon full buildout of the Proposed Project are not anticipated to exceed 105 vehicles in any single direction on any segment. This equates to a maximum impact of approximately 0.013 on an 8,000 vehicle-per-hour capacity segment. Therefore, the Proposed Project would not produce significant impacts on any of the freeway segments analyzed. In addition, as the freeway segments analyzed are those nearest the Project Site, where project-related traffic is the most concentrated and the potential for significant impacts is greatest, it is not anticipated that the significant impacts on other freeway segments farther from the Project Site would occur. Therefore, the Proposed Project would not conflict with the CMP or other standards established by the Los Angeles County

Metropolitan Transportation Authority for the designated CMP monitoring intersections or highways.

*(c) Neighborhood Intrusion*

Adjacent to the Project Site, Sunset Boulevard is designated a Major Highway–Class II, Van Ness Avenue is designated a Collector Street, and Bronson Avenue is designated as a Secondary Highway. Fernwood Avenue is a discontinuous Local Street with the segment along the south edge of the Project Site that is vacated and only a single block long that is not fronted by single family or other residences. In addition, south of Fernwood Avenue, Fountain Avenue, west of Bronson Avenue, and La Mirada Avenue, east of Bronson Avenue, are designated as Secondary Highways. Therefore, the Project Site is not directly served by a Local Street. Additionally, in the vicinity of the Project Site, there are no Local Streets that provide a continuous, uninterrupted parallel route of travel to a congested arterial. Furthermore, the Proposed Project traffic distribution developed in consultation with LADOT, does not include Project trips or divert non-Project traffic along Local Streets. Therefore, since Proposed Project traffic would not be anticipated to use local, residential streets, as none are in close proximity to the Project Site, the Proposed Project would not result in neighborhood intrusion and such impacts would be less than significant.

*(d) Access and Circulation*

Pursuant to the methodology outlined in the *City of Los Angeles CEQA Thresholds Guide*, site access impacts would normally occur if the intersection(s) nearest the primary site access is/are projected to operate at LOS E or F during the A.M. or P.M. peak hour, under "Future With Project" conditions. Intersection No. 7 (Bronson Avenue & Sunset Boulevard), along the perimeter of the Project Site, is projected to experience LOS F conditions during the P.M. peak hour. However, this intersection is also projected to operate at an unacceptable LOS during the P.M. peak hour in the "Future Without Project" conditions. In addition, while access to the overall SBS campus is provided along Bronson Avenue, primary site access is provided along Van Ness Avenue. Furthermore, as part of the Proposed Project, several driveway improvements would be implemented to improve site access and circulation. In addition, the secondary access/service vehicle driveway on Bronson Avenue and the service vehicle driveway on vacated Fernwood Avenue would both be retained under their existing configurations. Furthermore, the sightline study included in the Traffic Study determined that there are no potential sightline conflicts with other vehicles, including bicycles, at the Project Site driveways. There are also no street segments with a high level of pedestrian activity near the Project Site driveways. Therefore, based on the acceptable levels of service that would be experienced at the intersection nearest the primary site access driveway (Intersection No. 12 Van Ness

Avenue & Sunset Boulevard) and the proposed access improvements, Proposed Project access impacts pursuant would be less than significant.

*(e) Parking*

Parking for the Proposed Project would be provided in one subterranean level beneath the proposed office building that would provide approximately 100 spaces, and in the proposed primarily seven-story parking structure, which would provide approximately 1,635 spaces. Additional parking would be provided in 65 existing surface parking spaces located throughout the SBS campus that would remain. Therefore, upon implementation of the Proposed Project, a total of 1,800 parking spaces would be available within the SBS campus. When accounting for the 401 parking spaces that would be removed, the Proposed Project would provide a net of 1,399 parking spaces. Thus, parking to be provided by the Proposed Project would exceed the LAMC requirement of 796 parking spaces. As such, no significant parking impact would occur.

*(f) Public Transit*

Based on the available transit system capacity and the addition of Proposed Project generated transit trips, the Proposed Project would not cause the passenger load on the transit system to exceed the capacity of transit lines near the Project Site. During the A.M. peak hour the Proposed Project is anticipated to use approximately 7.3 percent of the remaining 76.6 percent transit system capacity. During the P.M. peak hour, the Proposed Project would be expected to use approximately 9.5 percent of the remaining 54.6 percent transit system capacity. Based on the small percentage of the remaining transit system capacity that would be used by the Proposed Project, it can be concluded that the Proposed Project would not add substantial new ridership to the transit lines operating in excess of their capacity. As such, impacts to public transit services would be less than significant.

*(g) Pedestrian/Bicycle Safety*

As further detailed in Section IV.G, Traffic, Access, and Parking, of the Draft EIR, the street segments along the SBS campus driveways are not considered high volume pedestrian areas. Additionally, with implementation of the Proposed Project, pedestrian safety would be enhanced at the Van Ness Gate by creating a longer queuing area for entering and exiting vehicles. Sidewalks would also be provided along each side of the driveway rather than the current configuration, with the perimeter wall immediately adjacent to the driving surface. The modifications would improve visibility and provide pedestrian paths outside of the traffic lanes. In addition, the new service driveway along Van Ness Avenue would be designed to include a convex mirror that commercial drivers would be instructed to use to address potential sight line obstruction. Furthermore, based on the

accident data reviewed, the current configuration of the driveway at Bronson Avenue has not presented an operational issue. However, as with the new service-only driveway proposed along Van Ness Avenue, in order to address potential sight line concerns for the existing Bronson Avenue driveway, installation of a convex mirror on the south edge of this driveway at its intersection with Bronson Avenue would be completed as part of Mitigation Measure F-10, below. The mirror would improve the visibility of pedestrians crossing the driveway from the sidewalk to the north for exiting vehicles. Therefore, with implementation of Mitigation Measure G-10 provided below, the Proposed Project would not substantially increase the potential for pedestrian/vehicle and/or bicycle/vehicle conflicts, and impacts to pedestrian and bicycle safety would be less than significant.

## b. Cumulative Impacts

### *(1) Construction*

As illustrated in Section III, Environmental Setting, of the Draft EIR, the related projects are dispersed throughout the Project Site area and would draw upon a workforce from all parts of the Los Angeles region. Many of the construction workers are anticipated to arrive and depart the individual construction sites during off-peak hours (i.e., arrive prior to 7:00 A.M. and depart between 3:00 to 4:00 P.M.) thereby avoiding generating trips during the A.M. and P.M. peak traffic periods. In addition, LADOT's established review process would take into consideration overlapping construction projects and would balance haul routes to minimize the impacts of cumulative hauling on any particular roadway. Although the Proposed Project would result in less than significant construction-related traffic impacts, cumulative impacts are concluded to be significant and unavoidable due to the potential for concurrent construction of the related projects in the vicinity of the Project Site in conjunction with the Proposed Project itself.

### *(2) Operation*

The traffic models used in the analysis of the Proposed Project above incorporated forecasted traffic increases due to ambient growth through the year 2014 as well as related projects. Furthermore, the CMP analysis evaluates traffic impacts on a larger, regional scale. Therefore, cumulative impacts on intersections, regional transportation system, and access as a result of the Proposed Project have been analyzed and incorporated. As concluded within the relative discussions above, the Proposed Project would result in significant impacts at seven study intersections prior to mitigation. However, with implementation of the mitigation measures below, such significant impacts would be reduced to less than significant levels. In addition, as discussed above, Proposed Project Impacts associated with the regional transportation system and access would also be less than significant.

With regard to public transit, similar to the Proposed Project, the related projects would generate an overall increase in transit riders. The anticipated increased transit ridership associated with the Proposed Project and related projects are not expected to exceed the capacity of transit systems. Thus, the Proposed Project's incremental contribution would not be significant, and cumulative impacts to transit would not be cumulatively considerable.

With regard to parking and access, it is anticipated that future related projects would be subject to City review to ensure that adequate parking and access would be maintained in the vicinity of the Project Site. Therefore, the Proposed Project's cumulative impacts related to these issues would not be cumulatively considerable.

## c. Mitigation Measures

### *(1) Construction*

While Proposed Project construction-related traffic impacts would be less than significant, the following mitigation measures are included to ensure impacts remain less than significant.

**Mitigation Measure G-1:** Prior to the start of construction, the Applicant shall devise a Construction Staging and Traffic Management Plan to be implemented during construction of the Proposed Project. The Construction Staging and Traffic Management Plan shall identify all traffic control measures, signs, and delineators to be implemented by the construction contractor through the duration of demolition and construction activities associated with the Proposed Project. The Construction Staging and Traffic Management Plan shall include but not be limited to, most, if not all, truck trips being scheduled during the first 8 hours of the permitted construction work period (7:00 A.M. to 3:00 P.M.) to avoid generating trips during the P.M. peak period. Additionally, the plan shall identify off-site construction worker parking locations when on-site parking is not available. The Construction Staging and Traffic Management Plan shall be subject to final approval by LADOT.

**Mitigation Measure G-2:** The construction area within the public right-of-way shall not extend beyond the north side of the main driveway (Van Ness Gate) to the south side of the service gate (refer to Figure 5 in the construction analysis provided in Appendix E-5 of the Traffic Study included in Appendix E of the Draft EIR) between 7:00 A.M. and 9:00 P.M. each day throughout the construction period;

**Mitigation Measure G-3:** Flag person(s) shall control construction trucks exiting the Project Site and assure the area of Van Ness Avenue is clear at all times. Construction trucks shall exit the site onto Van Ness Avenue south of the main driveway (Van Ness Gate). The flag person(s) shall assure the safety of any school children within the proximate roadway area of Van Ness Avenue (including sidewalks);

**Mitigation Measure G-4:** On Van Ness Avenue adjacent to the Project Site, a through lane in each direction plus the east-side parking area shall be kept available for normal public use at all times during the construction period;

**Mitigation Measure G-5:** The northbound left-turn lane on Van Ness Avenue at Sunset Boulevard shall be maintained as available for normal public use between 7:00 A.M. and 9:00 P.M. each day throughout the Project construction period; and

**Mitigation Measure G-6:** A Worksite Traffic Control Plan for Van Ness Avenue, approved by LADOT, shall be used throughout the construction period.

*(b) Operation*

**Mitigation Measure G-7:** *Bronson Avenue and Hollywood Boulevard*—Bronson Avenue shall be restriped to provide a right-turn lane in the northbound direction and a left-turn lane in the southbound direction. This measure would require the removal of approximately 9 parking spaces on Bronson Avenue.

**Mitigation Measure G-8:** *Bronson Avenue and Sunset Boulevard*—Bronson Avenue shall be restriped to provide a right-turn lane in the northbound direction. This measure would require the removal of approximately 4 parking spaces on Bronson Avenue.[1]

**Mitigation Measure G-9:** The Proposed Project shall implement signal system upgrades to ATCS at the locations identified below:

- 12. Van Ness Avenue and Sunset Boulevard
- 13. Van Ness Avenue and Santa Monica Boulevard
- 14. Wilton Place and Sunset Boulevard
- 15. Western Avenue and Hollywood Boulevard

[1] *As part of LADOT's review of the Traffic Study as included in Appendix F of the Draft EIR, LADOT reviewed and approved the mitigation measures, including Mitigation Measures G-7 and G-8, and concluded that the mitigation measures would not have significant parking impacts.*

- 16. Western Avenue and Sunset Boulevard

**Mitigation Measure G-10:** The Proposed Project shall include the installation of a convex mirror along the southern edge of the existing Bronson Avenue driveway as well as along the proposed new service-only driveway near the intersection of Van Ness Avenue and vacated Fernwood Avenue.

**Mitigation Measure G-11:** The Proposed Project shall comply with the provisions of the City's Transportation Demand Management Ordinance No. 168,700 in order to reduce the number of vehicle trips generated by the Proposed Project. The Applicant shall record a Covenant and Agreement to ensure compliance with the provisions of the Transportation Demand Management Ordinance. The Applicant shall develop and implement a Transportation Demand Management Plan that satisfies standard requirements of the Transportation Demand Management Ordinance and offers additional strategies to reduce the amount of vehicle trips generated by the Proposed Project. These additional strategies could include, but not be limited to, the following:

- Partially or fully subsidized transit passes offered to site employees
- Provide on-site education and information on alternative transportation modes and information on area transit services
- Guaranteed ride home for all employees that carpool, vanpool, or take transit to work
- Provide carpool and vanpool opportunities and financial incentives
- Provide wayfinding information and signage to encourage walking, promote the use of transit, and enhance access to transit stops
- Create a pedestrian friendly environment through wider sidewalks and improved amenities such as lighting, landscaping and shading
- Pursuant to Internal Revenue Code Section 132(f), arrange pre-tax dollar transit commute expense accounts to provide transportation fringe benefits to eligible employees
- Parking strategies, such as parking unbundling and parking cash-out.

### d. Level of Significance After Mitigation

#### *(1) Construction*

While construction-related traffic impacts associated with the Proposed Project would be less than significant, implementation of Mitigation Measures G-1 through G-6 would serve to further reduce the potential for impacts during construction. Cumulative construction-related traffic impacts would remain significant and unavoidable.

#### *(2) Operation*

As described above, the Proposed Project would create a significant impact at seven of the 20 study intersections during the A.M. and/or P.M. peak hours when compared with "Future Without Project" conditions. Implementation of the recommended mitigation measures would reduce the Proposed Project's traffic impacts at the seven significantly impacted intersections to less than significant levels.

## H. Water Supply

### a. Project Impacts

#### *(1) Construction*

Construction activities for the Proposed Project would result in a temporary increase in water demand. Demand for water would be associated with soil compaction and earthwork, dust control, mixing and placement of concrete, equipment and site cleanup, irrigation for plant and landscaping establishment, and other short-term related activities. These activities would occur incrementally throughout construction of the Proposed Project up to 2016, and would be temporary in nature. The amount of water used during construction would vary depending on the conditions of soils, weather, size of the construction site, and site-specific operations. However, given the temporary nature of construction activities, the short-term water demand generated from construction of the Proposed Project would be less than the net new water consumption of the Proposed Project at buildout. Furthermore, the existing water infrastructure would be adequate to serve the Proposed Project. Therefore, as demolition and construction activities would require minimal water demand and are not anticipated to have any adverse impact on available water supplies and infrastructure, construction-related impacts on water supply and infrastructure would be less than significant.

*(2) Operation*

Development of the Proposed Project would result in an increase in long-term water demand for consumption, operational uses, maintenance, and other activities on the Project Site. Buildout of the Proposed Project would result in an increase of approximately 79,856 gallons per day or 89.45 acre-feet per year in potable water demand. However, when accounting for the existing uses to be removed and implementation of water and energy conservation features pursuant to Title 24 of the California Code of Regulations as well as the City of Los Angeles requirements and project design features, buildout of the Proposed Project would result in a net increase of 66,908 gallons per day or 75 acre-feet per year of potable water demand.

Based on the Los Angeles Department of Water and Power's (LADWP) 2010 Urban Water Management Plan water demand projections, the water demand for the City in 2016 (the Proposed Project's buildout year) during average year hydrological conditions is expected to reach approximately 622,240 AF. During a single-dry year, water demand is forecasted to reach approximately 659,600 AF and during a multiple-dry year period, water demand is forecasted to reach 647,100 AF. As the Urban Water Management Plan anticipates adequate water supplies under average, single-dry, and multiple-dry year conditions through the year 2035, as well as the intervening years (i.e., 2016), the Proposed Project's estimated net increase in water demand would be within the available and projected water supplies through 2035. In addition, as set forth in the Water Supply Assessment for the Proposed Project, provided in Appendix G of the Draft EIR, the LADWP Board found that the LADWP can provide sufficient domestic water supplies to the Proposed Project. Therefore, the Proposed Project's operation-related impacts on water supply would be less than significant.

## b. Cumulative Impacts

As evaluated in Section IV.H, Water Supply, of the Draft EIR, the total annual cumulative water demand associated with the Proposed Project and the related projects would be within the available and projected water demand of the LADWP's 2010 Urban Water Management Plan. In addition, based on the service area reliability assessment conducted by the LADWP in its 2010 Urban Water Management Plan, LADWP determined that it would be able to reliably provide water to its customers through the year 2035, as well as the intervening years (e.g., 2016). Additionally, under the provisions of SB 610, LADWP is required to prepare a comprehensive water supply assessment for every new development "project" (as defined by Section 10912 of the Water Code) within its service area that reaches certain thresholds. The water supply assessment for such projects would evaluate the quality and reliability of existing and projected water supplies, as well as alternative sources of water supply and measures to secure alternative sources if needed. In addition, SB 221 requires that for residential subdivisions with 500 units or more that are

in non-urban areas, written verification from the service provider (e.g., DWP) be submitted indicating sufficient water supply is available to serve the proposed subdivision, or the local agency shall make a specified finding that sufficient water supplies are or will be available prior to completion of the project.

Furthermore, through LADWP's 2010 Urban Water Management Plan and *Securing L.A.'s Water Supply*, the City of Los Angeles would meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. These plans outline the creation of sustainable sources of water for the City of Los Angeles to reduce dependence on imported supplies. LADWP is planning to achieve these goals by expanding its water conservation efforts through public education, installing high efficiency water fixtures, providing incentives, and expanding the City's outdoor water conservation program. To increase recycled water use, LADWP is expanding the recycled water distribution system to provide water for irrigation, industrial use, and groundwater recharge. Compliance of the Proposed Project and future development projects with regulatory requirements that promote water conservation such as the LAMC, including the City's Green Building Code, would also assist in assuring that adequate water supply is available on a cumulative basis. Therefore, it is anticipated that LADWP would be able to supply the demands of the Proposed Project and future growth through 2016 and beyond. As such, cumulative impacts on water supply would be less than significant.

### c. Mitigation Measures

Based on the analysis above and with implementation of the Proposed Project's water conservation features, the Proposed Project would not result in significant impacts related to domestic water supply. As such, no mitigation measures are necessary.

### d. Level of Significance After Mitigation

With the implementation of the project design features and code compliance measures, Project-level and cumulative impacts on water supply would be less than significant.