CITY OF LOS ANGELES

CALIFORNIA ENVIRONMENTAL QUALITY ACT FINDINGS

AND

STATEMENT OF OVERRIDING CONSIDERATIONS

Paramount Pictures Master Plan

EIR CASE NO.: ENV-2011-2460-EIR
STATE CLEARINGHOUSE NO. 2011101035

As Modified by the Planning and Land Use Committee

September 6, 2016

CEQA FINDINGS OF FACT

I. INTRODUCTION

Paramount Pictures Corporation, the "Applicant," proposes the Paramount Pictures Master Plan Project which sets forth the framework to guide the development of the approximately 62-acre Paramount Studios site located within the Hollywood Community of the City of Los Angeles (the "Project Site").[1] The Project Site is comprised of the main studio property of approximately 56 acres (the "Main Lot") and six surrounding properties of approximately 6 acres (the "Ancillary Lots"). The Main Lot is generally bounded by Van Ness Avenue to the east, Melrose Avenue to the south, Gower Street to the west, and a cemetery to the north. The Ancillary Lots and their locations are as follows: the "Gregory Lot" located on the west side of Gower Street at Gregory Avenue; the "Waring Lot" located on the west side of Gower Street at Waring Avenue; the "Camerford Lot" located on the west side of Gower Street at Camerford Avenue; the "Windsor Lot" located on the south side of Melrose Avenue at Windsor Boulevard; the "South Bronson Lot" located on the south side of Melrose Avenue at Bronson Avenue; and the "Lemon Grove Lot" located on the east side of Van Ness Avenue, north of Lemon Grove Avenue.

The Paramount Pictures Master Plan Project (the "proposed Project") involves the redevelopment of portions of the Project Site with new studio-related uses, circulation improvements, parking facilities, and pedestrian-oriented landscaped areas. These improvements would be implemented through the proposed Paramount Pictures Specific Plan (the "proposed Specific Plan"), which would guide development within the Project Site through the year 2038. The proposed Specific Plan would allow for the construction of up to approximately 1,922,300 square feet of new stage, production office, support, office, and retail uses, and the removal of up to approximately 536,600 square feet of existing stage, production office, support, office, and retail uses, for a net increase of up to approximately 1,385,700 square feet of floor area within the Project Site upon completion of the proposed Project.

II. ENVIRONMENTAL DOCUMENTATION BACKGROUND

The project proposal was reviewed by the Los Angeles Department of City Planning (serving as lead agency) in accordance with the requirements of the California Environmental Quality Act ("CEQA") (Public Resources Code § 21000 *et seq*.; 14 Cal. Code Regs. § 15000 *et seq*.). An initial study was prepared for the project in October 2011 and is attached to the Draft EIR in Appendix A. In compliance with CEQA Section 21080.4, a Notice of Preparation ("NOP") was prepared by the City of Los Angeles Department of City Planning and distributed to the State Clearinghouse, Office of Planning and Research, responsible agencies and other interested parties. The NOP identified specific areas where the proposed project could have adverse environmental effects and determined that an EIR would need to be prepared to document these effects. The Department of City Planning issued the NOP on October 13, 2011. A public scoping meeting was held on October 27, 2011, at the First Presbyterian Church of Hollywood, 6054 Yucca Street, Hollywood, California, 90028, to receive community input on the proposed project and the scope of the EIR. Comments from identified responsible and trustee agencies, as well as interested parties on the scope of the Draft EIR, were solicited through the NOP process. Refer to Appendix A of the Draft EIR for a copy of the NOP and written comments submitted to the Department of City Planning in response to the NOP and scoping meeting.

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[1] The majority of the Project Site is located within the Hollywood Community Plan Area, while the Ancillary Lots south of Melrose Avenue are located within the Wilshire Community Plan Area.

The Draft EIR was submitted to the State Clearinghouse, Office of Planning and Research, and was circulated for public review and comment for a 45-day review period commencing on September 10, 2015 and ending October 26, 2015. Pursuant to Section 15088 of the CEQA Guidelines, the City of Los Angeles, as lead agency, reviewed all comments received during the review period for the Draft EIR and responded to each comment in Section III of the Final EIR.

The Department of City Planning prepared a Final EIR for the project, which was completed on April 14, 2016, and is hereby incorporated by reference in full. The Final EIR was made available for review on the City's website [http://planning.lacity.org/eir/Paramount/FEIR/index.html]. The Final EIR was also made available at libraries and the Department of City Planning. The Final EIR is intended to serve as an informational document for public agency decision-makers and the general public regarding the objectives and components of the proposed Project. The Final EIR addresses the environmental effects associated with implementation of the proposed Project, identifies feasible mitigation measures and alternatives that may be adopted to reduce or eliminate these impacts, and includes written responses to all comments received on the Draft EIR. Responses were sent to all public agencies that made comments on the Draft EIR at least 10 days prior to certification of the Final EIR pursuant to CEQA Guidelines Section 15088(b). Notices regarding availability of the Final EIR were sent to those within a 500-foot radius of the Project Site as well as individuals who attended the scoping meeting and provided comments during the NOP and Draft EIR comment periods.

The Department of City Planning subsequently issued an Errata in July 2016, to provide minor technical corrections to the text in the Executive Summary and Corrections and Additions sections of the Final EIR to reflect the analysis included in the EIR. The Draft EIR identified a potentially significant impact on Caltrans facilities based on a supplemental analysis of Caltrans facilities using Caltrans methodology which was included in the Analysis section and summary of environmental impacts in the Executive Summary of the circulated Draft EIR, but inadvertently omitted it from the summary of significant unavoidable impacts in the Executive Summary of the Draft EIR. The Errata expressly identified this omission and clearly corrected the text in the Executive Summary and Corrections and Additions sections of the Final EIR to reflect the supplemental Caltrans analysis included in the EIR. The EIR did not require recirculation as no new significant Environmental Impacts were identified and no new information was submitted which would warrant such recirculation.

A. RECORD OF PROCEEDINGS

The City of Los Angeles Department of City Planning Deputy Advisory Agency and Hearing Officer conducted a duly noticed concurrent public hearing on May 16, 2016 to receive public testimony on the proposed entitlements and environmental documents. The Deputy Advisory Agency issued its letter of determination on June 7, 2016, approving Tentative Tract 71751 for the merger and phased resubdivision of the Main Lot and one Ancillary Lot to ten ground lots (8 lots on the Main Lot and 2 lots on the Ancillary Lot), certifying the EIR and adopting the Mitigation Monitoring Program (MMP), these Findings, and a Statement of Overriding Considerations. The Advisory Agency's determination was subsequently appealed on June 17, 2016. On July 14, 2016, the City Planning Commission denied the appeal in part and granted in part to allow technical corrections to Tentative Tract No. 71751.The City Planning Commission further recommended approval of the remaining entitlements, including a General Plan Amendment, Zone Change, Specific Plan, including sign regulations and a historic preservation plan, Code amendment, and Development Agreement, certification of the EIR, including the Errata, adoption of the Mitigation Monitoring Program (MMP), including project design features and mitigation measures, these Findings, and a Statement of Overriding Considerations. The City Planning Commission's denial of the appeal on Tentative Tract 71751 was subsequently appealed on August 19, 2016. On

September 6, 2016, the Planning and Land Use Management (PLUM) Committee recommended approval of the above-referenced entitlements, with the exception of the appeal to Tentative Tract 71751, which was recommended for denial by the PLUM Committee on September 13, 2016. The PLUM Committee further recommended certification of the EIR, including the Errata, adoption of the Mitigation Monitoring Program (MMP), including project design features and mitigation measures, these modified Findings, and a Statement of Overriding Considerations. The City Council denied the appeal on TT-71751, and approved the General Plan Amendment, Zone Change, Specific Plan, Code Amendment, and Development Agreement, as well as certification of the EIR, including the Errata, adoption of the Mitigation Monitoring Program (MMP), including project design features and mitigation measures, these modified Findings, and a Statement of Overriding Considerations, at its September 27, 2016 meeting.

The documents and other materials that constitute the record of proceedings on which the City of Los Angeles' CEQA findings are based are located at the Department of City Planning, 6262 Van Nuys Boulevard, Room 351, Van Nuys, California 91401. This information is provided in compliance with CEQA Section 21081.6(a)(2).

III. FINDINGS REQUIRED TO BE MADE BY LEAD AGENCY UNDER CEQA

Section 21081 of the California Public Resources Code and Section 15091 of the CEQA Guidelines require a public agency, prior to approving a project, to identify significant impacts of the project and make one or more of three possible findings for each of the significant impacts. The possible findings are:

> "Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR." (State CEQA Guidelines, § 15091, subd. (a)(1))
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> "Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency." (State CEQA Guidelines, § 15091, subd. (a)(2))
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> "Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR." (State CEQA Guidelines, § 15091, subd. (a)(3))

The findings reported in the following pages incorporate the facts and discussions of the environmental impacts that are found to be significant in the Final EIR for the proposed Project as fully set forth therein. Although Section 15091 of the CEQA Guidelines does not require findings to address environmental impacts that an EIR identifies as merely "potentially significant," these findings nevertheless fully account for all such effects identified in the Final EIR. For each of the significant impacts associated with the proposed Project, either before or after mitigation, the following sections are provided:

a) Description of Significant Effects - A specific description of the environmental effects identified in the EIR, including a judgment regarding the significance of the impact.

b) Project Design Features – Identified project design features or actions that are included as part of the proposed Project and set forth in the Mitigation Monitoring Program.

c) Mitigation Measures - Identified mitigation measures or actions that are required as part of the proposed Project and set forth in the Mitigation Monitoring Program.

d) Finding - One or more of three specific findings in direct response to CEQA Section 21081 and CEQA Guidelines Section 15091.

e) Rationale for Finding - A summary of the reasons for the finding(s).

IV. DESCRIPTION OF THE PROPOSED PROJECT

A. PROJECT DESCRIPTION

The proposed Project consists of a Tract Map, General Plan Amendment, Zone Change, and adoption of the proposed Specific Plan (including sign regulations and a Historic Resources Preservation Plan) to guide development within the Project Site through the year 2038, as well as a related Code Amendment; Development Agreement; demolition, grading, excavation, and building permits; and any additional actions as may be deemed necessary or desirable. Under the proposed Specific Plan, portions of the Project Site would be redeveloped with new studio-related uses, circulation improvements, parking facilities, and pedestrian-oriented landscaped areas.

The proposed Specific Plan would establish development guidelines and standards that would be used to regulate basic planning and development concepts for future development within the Project Site. These development guidelines and standards would provide a measure against which specific future development proposals can be evaluated. As such, the proposed Specific Plan would create a regulatory framework that accounts for the unique needs of the Project Site and the surrounding community and allows flexibility for adapting to future changes that could occur in the entertainment industry. The primary development regulations set forth in the proposed Specific Plan would address land use, sign regulations, historic preservation, design, alcohol sales, child care facilities, and parking, as well as associated implementation procedures.

The proposed Specific Plan would allow for the construction of up to approximately 1,922,300 square feet of new stage, production office, support, office, and retail uses. With the proposed removal of approximately 536,600 square feet of stage, production office, support, office, and retail uses, this would result in a net increase of approximately 1,385,700 square feet of floor area within the Project Site upon completion of the proposed Project, with exchange of floor area (square footage) between certain land use categories permitted, subject to the Land Use Exchange provisions of the proposed Specific Plan in conjunction with a Project Permit Compliance Review approval. The Conceptual Site Plan is an illustration of how development within the Project Site may occur in conformance with the proposed Specific Plan. It should be noted, however, that actual development would be governed by the requirements of the proposed Specific Plan and not the Conceptual Site Plan. That is, the Conceptual Site Plan represents just one possible development scenario.

As part of ongoing operations at the Project Site, it was anticipated that additions and changes to the Project Site would occur on a continuous basis, including interior and exterior improvements. During the review process for the proposed Project, it was anticipated that approximately 50,000 square feet of new floor area consisting of new office, stage, production office, and/or support uses would be constructed as part of ongoing business activities. These additional facilities were referred to as “interim projects” and were considered in the Project Impacts section for each of the environmental issue analyses in the EIR. However, the interim projects were not constructed and all development shall comply with the regulations of the Paramount Pictures Specific Plan.

B. PROJECT OBJECTIVES

The proposed Project's specific objectives are as follows:

1. Substantially enhance the role of the Project Site in the movie, television, and entertainment industry, and in so doing, contribute to the preservation of Hollywood as the international focus for the movie, television and entertainment industry;

2. Modernize and upgrade the facilities at the Project Site to meet the increased competition for movie, television, and entertainment production and post-production facilities from other worldwide locations, including competition from other studios in the Los Angeles region;

3. Provide new state-of-the-art and technologically advanced soundstages, production offices, and post-production areas within the Project Site to meet the anticipated future demand of the movie, television, and entertainment industry and allow flexibility to incorporate future technology advances;

4. Establish a clear and consistent set of guidelines to provide a level of certainty for future development of the Project Site to meet the anticipated future demand of the movie, television, and entertainment industry and to remain competitive;

5. Maximize opportunities for the local and regional economy by creating construction jobs and a wide range of jobs serving the movie, television and entertainment industry;

6. Improve the identity of the Project Site as a movie, television and entertainment industry area and enhance the visual appearance of the Project Site by providing architecturally distinct development and a creative signage program reflective of the movie, television and entertainment uses while preserving the historic character of the Project Site;

7. Provide a campus environment and incorporate and integrate a mix of uses that maximizes synergies and efficiencies between people, uses and buildings within the Project Site;

8. Establish clear guidelines for the preservation of the historic character of the Project Site while allowing for the development of state-of-the-art facilities for the movie, television and entertainment industry;

9. Provide producers, writers, actors, and other creative personnel, and related administrative personnel, with offices, work spaces, and general offices to meet the demand for the movie, television, and entertainment industry and to remain competitive with other production facilities in the region and worldwide;

10. Provide new production support facilities for storage and on-lot distribution of lighting, props, and other equipment, and expand employee amenities and increase gathering spaces for employees to meet increased demand for facilities;

11. Provide for increased production “base camps” directly adjacent to production offices and filming facilities and areas on the Project Site to allow for the flexible and efficient staging of trucks and trailers needed for talent, lighting, grip, costume, and other production services; and

12. Provide new parking on the Project Site that is sufficient and conveniently located, and enhance and improve internal circulation throughout the Project Site, including truck circulation within the Main Lot, to enhance efficiency and safety.

V. ENVIRONMENTAL IMPACTS FOUND IN THE INITIAL STUDY NOT TO BE SIGNIFICANT

The City of Los Angeles Department of City Planning prepared an Initial Study dated October 13, 2011, which determined that the proposed Project would not have the potential to cause significant impacts in the following areas: agricultural and forest resources; biological resources; and mineral resources. Therefore, these issue areas were not examined in detail in the EIR. The rationale for the conclusion that no significant impact would occur in each of these issue areas is summarized below, and based on that rationale, and other evidence in the administrative record relating to the proposed Project, the City finds and determines that the following environmental impact categories will not result in any significant impacts and that no mitigation measures are needed.

A. Agricultural and Forest Resources

The Project Site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program. No agricultural or other related activities currently occur on the Project Site or within the Project vicinity. In addition, no agricultural zoning, forest land or timberland zoning is present in the surrounding area, and no nearby lands are enrolled under the Williamson Act. As such, no impacts to agricultural and forest resources would occur and no mitigation measures are required.

B. Biological Resources

The Project Site is located in a highly urbanized area and is currently developed with buildings, surface parking areas, and limited landscaping. Given the urbanized nature of the Project area and the fact that the Project Site has already been disturbed, the likelihood of the presence of any endangered and/or threatened species is remote. Furthermore, no candidate, sensitive, or special statues species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS) are known to be present or have been identified on-site. No riparian habitat or sensitive natural communities are located on-site, nor have they been identified in City or regional plans, policies, or regulations of the CDFW or USFWS as being within the Project Site. In addition, there are no federally protected waters or wetlands, as defined by Section 404 of the Clean Water Act, that exist on or in the vicinity of the Project Site. There are also no native resident, migratory fish, or wildlife species or established native resident or migratory wildlife corridors on-site or within the Project vicinity, nor would the Project impede any use of native wildlife nursery sites. Only wildlife commonly found in developed, urban areas are expected to be found within the Project Site. Finally, the Project Site is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other

approved local, regional, or state habitat conservation plan. The Project Site includes approximately 800 trees, some of which may be removed for implementation of the Project, in addition to approximately 400 ficus trees maintained as a screen along the eastern and southern perimeter of the Main Lot in association with the security fencing. However, there are no protected trees as defined by the City of Los Angeles Protected Tree Ordinance (Ordinance No. 177404) located on the Project Site. The Project Site is not subject to any other local policies or ordinances protecting biological resources. Thus, the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Based on the above, no impacts to biological resources would occur, and no mitigation measures are required.

C. Mineral Resources

No mineral extraction operations currently occur on the Project Site. The Project Site is located within a highly urbanized area of the City of Los Angeles and has been previously disturbed by development. As such, the potential for mineral resources to occur on-site is low. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey. The Project Site is not located within a City-designated oil field or oil drilling area. Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impacts to mineral resources would occur and no mitigation measures are required.

VI. ENVIRONMENTAL IMPACTS FOUND NOT TO BE SIGNIFICANT PRIOR TO MITIGATION

The Los Angeles Department of City Planning prepared an Initial Study for the Project in which it required analysis of the following environmental impact areas in an EIR: Aesthetics (including views, light/glare, and shading); Air Quality (including greenhouse gas emissions); Cultural Resources (including historic resources, and archaeological and paleontological resources); Geology and Soils; Hazards and Hazardous Materials; Hydrology and Surface Water Quality (including groundwater); Land Use and Planning; Noise; Employment, Housing and Population; Public Services (including police protection, fire protection, schools, parks and recreation, and libraries); Traffic, Access, and Parking; and Utilities and Service Systems (including water supply, wastewater, solid waste, and energy). The following impact areas were determined to be less than significant prior to mitigation, and based on that analysis and other evidence in the administrative record relating to the Project, the City finds and determines that the following environmental impact categories will not result in any significant impacts and that no mitigation measures are needed:

A. Aesthetics/Visual Quality and Views

1. Aesthetics/Visual Quality

a) Construction

Overall, while Project construction activities would affect the visual character of the area on a short-term basis, they would not substantially alter or degrade the existing visual character of the Project Site or introduce permanent elements that would substantially detract from the visual character of the surrounding area for the following reasons: (1) views of construction activities would be limited in duration and location; (2) the site appearance would be typical of construction sites in

urban areas; (3) construction would occur within an urban setting with a high level of human activity and development; and (4) impacts would be reduced through standard best management practices implemented during the construction period, including the use of construction fencing to screen much of the construction activity from view at street level. Therefore, visual quality impacts associated with construction would be less than significant.

b) Operations

Implementation of the proposed Project would result in the removal of some existing buildings, structures, paving, and landscaping and would involve the development of new buildings, structures, paving, and landscaping consistent with the proposed Specific Plan, including the Historic Resources Preservation Plan. The proposed Project would create an integrated site with a mix of entertainment-related uses, similar to and building upon those that currently exist on-site as well as in the surrounding area. Buildout of the proposed Project would increase the height, density, and mass of on-site structures as compared to existing conditions, but would incorporate variations in building planes to reduce the effect of massing and provide a pedestrian scale adjacent to the public streets.

The areas surrounding the Project Site include clusters of industrial development, housing entertainment-related uses, such as pre- and post-production facilities, similar to those located on-site, and other commercial uses. The broader Hollywood area encompasses a variety of neighborhoods, including intensely developed commercial areas, mixed-use centers with high tourist traffic and active nightlife, a theater district, and areas with high-rise development, all of which are interspersed with single-family and multi-family residential neighborhoods. In particular, commercial and residential towers punctuate the skyline along many streets in Hollywood, such as Rossmore Avenue to the southwest of the Project Site and Sunset Boulevard, Hollywood Boulevard, and Vine Street to the north. Overall, the proposed Project building heights would be similar to and/or compatible with those both on-site and in the surrounding area. The majority of the building heights across the Project Site would be substantially similar to other buildings in the Project vicinity, such as the four-story Raleigh Studios, and other existing mid-rise structures that would remain on-site. The proposed Project would also increase the density of development on the Project Site. The Project Site currently exhibits some contrast with the surrounding area in terms of building heights and density. Existing buildings, security walls, and gates currently extend along the Main Lot's property lines. The increase in density that would occur under the proposed Project, particularly along the Melrose Avenue frontage, would not be out of character for the Project Site or its relationship to the surrounding area. Overall, the proposed Project's density would be compatible with the existing developed nature of the Project Site and surrounding area. Much of the new construction within the Main Lot would be concentrated in the southern half of the Main Lot, increasing the intensity of development along the Melrose Avenue frontage. New buildings in a variety of building heights would replace surface parking lots, creating visual interest and strengthening the Studio's identity along this major arterial street. Overall, the proposed development along Melrose Avenue would be compatible with the surrounding environment, where Melrose Avenue serves as a major commercial arterial and where the Main Lot's Melrose frontage serves as the primary visual and physical gateway to the Project Site.

At the Ancillary Lots, the proposed Project would infill what are primarily surface parking lots with uses that are compatible with the character of the area. Overall, the development proposed on the Ancillary Lots would be compatible with surrounding development in terms of building height,

density, and overall design and would provide a more consistent commercial streetscape along Melrose Avenue.

Under the proposed Project, it is anticipated that the primary building materials would continue to include stone, stucco, and glass, thus tying into the existing building context, campus color, and material palette. Further, implementation of the Historic Resources Preservation Plan would promote architectural compatibility between new construction and existing development on the Main Lot. Although precise building designs have not been prepared yet, through compliance with the Preservation Plan, new development would reference the architectural features of the existing buildings in order to further promote the visual identity of the Project Site. Landscape improvements would also be used as unifying visual elements. Additionally, visual screening would be implemented for uses such as loading docks, trash/recycling areas, rooftop equipment, and outdoor storage areas visible from public pedestrian locations within 500 feet of the perimeter of the Project Site so as not to detract from the visual character of the Project Site.

Project signage would be coordinated and regulated by the proposed signage regulations within the Specific Plan. Similar to existing conditions, additional signage would be located within the site interior, the majority of which would not be visible from off-site. Where signage would be visible from off-site areas, consideration is given to the placement of specific types of signs within the context of the surrounding environment. Accordingly, no substantial impact related to visual contrast would occur as a result of Project signage.

Project outdoor security and architectural lighting would provide security and aesthetic enhancements while also being sensitive to nearby properties. Limitations on illumination levels would preclude overly bright lighting that could disrupt the visual quality of the Project area. Project lighting would comply with Los Angeles Municipal Code (LAMC) requirements as well as relevant City regulations with respect to new lighting within the public right-of-way.

Some contributors to the potential historic districts within the Main Lot that are visible from limited areas off-site may be removed as part of the proposed Project. However, compliance with the Preservation Plan, along with Mitigation Measures C-1 through C-6 set forth in the MMP (which are specific to historic impacts), would ensure that Project development activities, including demolition, construction, rehabilitation, and preservation activities, do not diminish the historic integrity of the potential historic districts on the Project Site. Overall, the visual character of the Main Lot as viewed from off-site would continue to be predominantly defined by the perimeter wall formed by buildings on Gower Street and a portion of Melrose Avenue, with related entertainment signage at the corner; the KCAL Building; a fence covered by a thick hedge and landscaping along portions of Melrose Avenue; the arched entry gate at the Melrose Gate; and the landscaping and security wall along Van Ness Avenue that permits intermittent views of contributor buildings within the eastern portion of the Main Lot. Therefore, the proposed Project would not result in the removal or alteration of a substantial amount or proportion of existing features that contribute to the valued visual character or image of the Project Site.

Moreover, the proposed Project would not cause any of the following: substantial degradation of the existing visual character or quality of the Project Site or the surrounding vicinity; removal or development of a substantial amount of existing open space; a substantial degree of contrast between proposed features and existing features that represent the Project Site's aesthetic

image; or the development of buildings that detract from the existing style or image of the Project Site or surrounding area due to density, height, bulk, setbacks, signage, or other physical elements. As such, the proposed Project would not substantially alter, degrade, or eliminate the existing visual character of the Project Site or surrounding area, including valued existing features or resources, or introduce elements that substantially detract from the visual character. Impacts related to aesthetics/visual quality would be less than significant.

Further, it is noted that in 2013, the State of California enacted Senate Bill 743 (SB 743). Among other things, SB 743 adds Public Resources Code Section 21099, which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Public Resources Code Section 21099 defines a "transit priority area" as an area within 0.5 mile of an existing or planned major transit stop, which Public Resources Code Section 21064.3 defines as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." Pursuant to SB 743 and Public Resources Code 21099, an employment center project is a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. Public Resources Code Section 21099 defines an infill site as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. The Project proposes a zone change to Specific Plan that would include commercial uses, and the total Project development would result in a Project Site-wide FAR of approximately 1.2:1. The Project Site is an infill site within an area identified by the City as a transit priority area as defined in Public Resources Code Section 21099. As such, under SB 743, the Project's aesthetic and parking impacts would not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099. Nonetheless, the environmental analysis considered the potential impacts of the Project on aesthetics and parking.

2. Views

None of the roadways within the immediate Project vicinity are designated as scenic highways. Valued visual resources identified on-site include: the water tower and the original Bronson Gate; the Melrose Gate; the perimeter wall formed by office buildings and sound stages fronting Gower Street and Melrose Avenue, which are considered historic contributors; the KCAL Building; limited portions of other contributors to the potential Paramount Pictures Historic District visible from off-site (e.g., the Bluhdorn Building and the Set Lighting and Grip Building); and the northern façades of some of the industrial buildings and sound stages along the northern property boundary. Valued visual resources in the surrounding area that are visible from the Project Site vicinity include the Hollywood Hills and the Hollywood Sign.

Most views of and across the Project Site would experience little if any change as a result of Project implementation. The majority of the Project Site is not visible from vantage points greater than one to two blocks away from the Project Site. While Project development would be visible from off-site locations within one or two blocks of the Project Site, view impacts would typically occur at limited vantage points, as opposed to along extensive roadway segments or from entire large geographic areas. Similarly, while individual on-site visual resources may be obstructed, the

proposed Project would not result in the obstruction of a substantial amount or proportion of existing features that contribute to the valued view of the Project Site. Moreover, Project development may open up new opportunities for views of existing valued visual resources and would enhance certain views, such as views of the Bronson Gate from the Main Lot entrance at Melrose Avenue and Bronson Avenue. In addition, the proposed Project would not affect views from a designated scenic highway, corridor, or parkway. It is also specifically noted that based on the proposed Project's characteristics, particularly building heights, and an evaluation of simulated composite photographs showing existing and future conditions based on the Conceptual Site Plan at representative locations, as viewed from a range of distances and variety of directions relative to the Project Site, Project development would not affect views of the Hollywood Hills or the Hollywood Sign to the north on an overall basis. As such, on an overall basis, the proposed Project would not obstruct an existing valued view, and view impacts would be less than significant. In addition, as discussed above, it is noted that the Project's aesthetic impacts, including views, would not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099.

3. Project Design Features

The proposed Specific Plan included in Appendix B of the Draft EIR includes regulations related to screening and rooftop parking lighting and screening that would reduce impacts related to aesthetics/visual quality and views (see Section 5 of the Specific Plan):

- **Screening.** New buildings that have rooftop equipment or outdoor storage that is visible from public pedestrian locations within 500 feet of the perimeter of the Project Site shall screen such rooftop equipment and outdoor storage areas to minimize its view from public pedestrian locations. Screening devices may include vegetated walls, fences, trellises, graphic treatments, other structures, or other measures approved by the Director of Planning.

- **Rooftop Parking Lighting.** New parking structures that have rooftop parking shall shield the light sources on the rooftop level so as to direct the lighting on-site.

- **Rooftop Parking Screening.** The rooftop parking level of new parking structures shall include a parapet wall of at least 3.5 feet.

Further, the following additional project design features are included in the MMP with regard to aesthetics/visual quality and views:

Project Design Feature A.1-1: Where Project construction is visible from pedestrian locations adjacent to the Project Site and perimeter walls or fencing do not already exist, temporary construction fencing shall be placed along the periphery of the development sites to screen construction activity from view at the street level from off-site.

Project Design Feature A.1-2: 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 that are accessible/visible to the public, and that such temporary barriers and walkways are maintained in a visually attractive manner throughout the construction period.

Project Design Feature A.1-3: New on-site utilities that may be required to serve the proposed Project shall be installed underground.

4. Cumulative Impacts

a) Aesthetics/Visual Quality

Few of the related projects are located sufficiently close to the Project Site to enter the same field of view as the proposed Project. Regardless, future developments generally would be subject to applicable LAMC requirements, such as height limits and density and setback requirements, and many would be subject to review by the City to ensure consistency with adopted guidelines and standards that relate to aesthetics and visual quality. Therefore, it is not anticipated that future development inclusive of the proposed Project, interim projects, and related development would substantially alter, degrade, or eliminate the existing visual character of the Project area, including valued existing features or resources, or introduce elements that substantially detract from the visual character of the area. Cumulative impacts would be less than significant.

b) Views

In general, related projects have the potential to block views from local streets and other public vantages throughout a project area. With respect to the proposed Project, the views most likely to be affected on a cumulative basis are north-facing views of the Hollywood Hills and the Hollywood Sign. However, as previously indicated, the proposed Project would not affect views of the Hollywood Hills or Hollywood Sign, which, due to the densely developed nature of the area, are generally only available when looking north along adjacent north-south roadways, including Gower Street, rather than when looking north across the Project Site. Based on the proposed Project's characteristics, particularly building heights, and an evaluation of simulated composite photographs showing existing and future conditions based on the Conceptual Site Plan at representative locations, as viewed from a range of distances and variety of directions relative to the Project Site, Project development would not affect views of the Hollywood Hills or the Hollywood sign to the north on an overall basis, and view impacts would be less than significant. Given the limited number and location of the related projects within any field of view that includes the Project Site, view impacts would occur at a distance where such changes are not discernible within the broad urban landscape. As such, cumulative view impacts would be less than significant.

B. Light and Glare

1. Construction

To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of Project construction. Construction lighting would be focused on the particular area undergoing work. Construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements. Additionally, as a project design feature, construction lighting would be shielded and/or aimed so that no direct beam illumination would fall outside of the Project Site boundary. Thus, with adherence to existing LAMC regulations and the construction lighting project design feature, light resulting from construction activities would not substantially alter the character of off-site areas surrounding the

Project Site, or interfere with the performance of an off-site activity. Therefore, light spill impacts associated with construction would be less than significant.

As set forth in Project Design Feature A.1-1, where construction is visible from pedestrian locations adjacent to the Project Site and perimeter walls or fencing do not already exist, temporary construction fencing would be placed along the periphery of the development sites to screen construction activity from view at the street level from off-site locations. As such, glare from construction activities would not substantially alter the character of off-site areas surrounding the Project Site, or interfere with the performance of an off-site activity. Therefore, glare impacts associated with construction would be less than significant.

2. **Operation**

The proposed Project would include new lighting for safety, security, architectural features, signage and use of the facilities that would be developed as part of the proposed Project. The potential for light spill to occur with Project development would be reduced by existing LAMC requirements and the project design features. In addition, any new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would be approved by the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light spill on adjacent properties. As shown in the photometric analysis included with the Draft EIR, the levels of light spill from Project lighting would not exceed 2 foot-candles, and Project operations, including the proposed signage program, would result in light spill impacts that would be less than significant. In addition, as discussed below, the Specific Plan further limits the proposed signage beyond what was analyzed in the EIR. Finally, lighting used for outdoor production, special effects and special events would not increase lighting over existing conditions and would therefore not result in a significant impact.

Daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of on-site activity, such as the operation of a motor vehicle. With the implementation of the project design features, daytime glare attributable to the proposed Project would be controlled. Thus, Project development would not incorporate substantial amounts of highly reflective building materials or signage that would be highly visible to off-site glare-sensitive uses, and would not substantially alter the character of the off-site areas surrounding the Project Site nor interfere with the performance of an off-site activity. As a result, Project daytime glare impacts would be less than significant.

Nighttime glare can result from buildings, signs, or thematic elements that include reflective materials that are located within highly visible areas. With existing regulations and the proposed project design features, including shielding of rooftop parking lights, building, parking and security lighting levels would not result in a significant glare impact.

Based on field observations and the proposed signage program, digital display signs, scrolling digital display signs, projected image signs and supergraphic signs have the potential to cause glare impacts. The Draft EIR evaluated the initially-proposed project design features which would limit Project nighttime lighting with regard to glare from proposed digital display signs, projected image signs and scrolling digital display signs to 600 candelas per meter squared (cd/m^2), which is below the significance threshold of 800 cd/m^2, and would not substantially alter the

character of the off-site areas surrounding the Project Site or interfere with the performance of an off-site activity. Therefore, Project impacts with regard to nighttime glare were found to be less than significant. The Specific Plan further limits the proposed signage program beyond what was analyzed in the EIR, including prohibiting digital display signs, scrolling digital display signs, projected image signs and supergraphic signs. This change in the proposed signage regulations would further reduce the Project's less than significant impacts with regard to artificial light and glare.

3. **Project Design Features**

As previously described, future development under the proposed Project would be subject to the proposed Specific Plan included as Appendix B of the Draft EIR, which includes regulation of rooftop parking lighting that would reduce impacts related to light spill (see Section 5 of the proposed Specific Plan).

- **Rooftop Parking Lighting.** New parking structures that have rooftop parking shall shield the light sources on the rooftop level so as to direct the lighting on-site.

Further, in addition to the requirements of the LAMC, the following additional project design features are included in the MMP with regard to light spill and contrast/glare:

Project Design Feature A.2-1: Light sources associated with proposed Project construction shall be shielded and/or aimed so that no direct beam illumination is provided outside of the Project Site boundary. However, construction lighting shall not be so limited as to compromise the safety of construction workers.

Project Design Feature A.2-2: Outdoor security and architectural lighting shall be shielded and/or directed toward the areas to be lit to limit spill-over onto adjacent uses where appropriate.

Project Design Feature A.2-3: Glass used in building façades shall minimize glare in a manner consistent with applicable energy and building code requirements.

Project Design Feature A.2-4: Prior to issuance of a building permit for a new structure that abuts a residential property, the building plans shall include documentation that the building lighting will not exceed 2 foot-candles as measured at the adjacent residential property.

4. **Cumulative Impacts**

Development of the proposed Project, interim projects, and other related projects in the area would introduce new or expanded sources of artificial light. However, the additional artificial light sources introduced by these projects would not significantly alter the existing lighting environment that currently exists in the immediate Project area because the related projects include land use types that are typical for the area and are not known to generate excessive or otherwise unusual lighting levels, and because of existing ambient light levels in the vicinity. In addition, each of the related projects would be required to comply with existing regulatory requirements that address artificial light. It is not anticipated that the related projects would result in cumulative light spill impacts due to the types of uses proposed, their distances from the Project Site, and existing

ambient light levels in the vicinity. As a result, cumulative light spill impacts would be less than significant.

With regard to daytime 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 used would not create significant glare impacts. In addition, the proposed Project's contribution to a daytime glare impact would not be cumulatively considerable, and therefore cumulative daytime glare impacts would be less than significant. Cumulative nighttime glare impacts are also anticipated to be less than significant for the same reasons as those cited above with regard to the proposed Project's less than significant cumulative light spill impacts.

C. Air Quality (Construction: Toxic Air Contaminants and Odors; Operations: Toxic Air Contaminants, Odors, and Consistency with Air Quality Plans)

1. Construction

a) Toxic Air Contaminants

The greatest potential for TAC emissions during construction would be related to diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. The results of the analysis for the construction of the proposed Project yield a maximum incremental increase in offsite individual cancer risk of 6.7 in a million over the duration of construction and an excess cancer burden of 0.05, where the maximum impact occurs at residential uses south of the Project Site. The chronic hazard index is approximately 0.01 and is less than the South Coast Air Quality Management District (SCAQMD) significance threshold of 1.0. As the proposed Project would not emit carcinogenic or toxic air contaminants that individually or collectively exceed the maximum individual cancer risk of 10 in one million or result in an excess cancer burden of 0.5 or more, Project-related toxic emission impacts from construction activities would be less than significant and no mitigation is required.

b) Odors

Compliance with the requirements in Sections 2480 and 2485 in Title 13 of the California Code of Regulations (CCR) and Section 93115 in Title 17 of the CCR would minimize potential diesel odors during construction to a less than significant level. Other potential sources that may emit odors during construction activities include the use of architectural coatings and solvents. SCAQMD Rule 1113 limits the amount of VOC from architectural coatings and solvents. As a result of the Applicant's mandatory compliance with applicable SCAQMD rules and regulations, construction activities or materials would not cause a significant impact related to odors.

2. Operations

a) Toxic Air Contaminants

Based on the low incremental increase in the number and long-term (annual average) activity of the on-site toxic air contaminant sources and compliance with applicable California Air Resources Board (CARB) and SCAQMD rules and regulations, potential air toxic containment impacts associated with the proposed Project would be less than significant. Typical sources of

acutely and chronically hazardous toxic air contaminants include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, petroleum refinery). The proposed Project would not include these types of potential industrial manufacturing process sources. It is expected that quantities of hazardous toxic air contaminants located on-site would be below thresholds warranting further study under the California Accidental Release Prevention Program. As such, the proposed Project would not release substantial amounts of toxic contaminants, and no significant impact on human health would occur.

b) Odors

The proposed Project does not include any uses identified by the SCAQMD as being associated with odors, and ongoing facility operations have not received any notices of violation or notices to comply associated with odors over the last two decades. The proposed Project does include restaurant uses which have the potential to emit odors through cooking and charbroilers. However, the proposed Project would minimize the release of odors from restaurant uses with odor reducing equipment as required by SCAQMD Rule 1138. Garbage collection areas for the proposed Project would be covered and situated away from the property line and sensitive uses where feasible. Good housekeeping practices would be sufficient to prevent objectionable odors. Therefore, potential odor impacts would be less than significant.

c) Consistency with Air Quality Plans

(1) SCAQMD CEQA Air Quality Handbook Policy Analysis

The determination of AQMP consistency is primarily concerned with the long-term influence of the proposed Project on air quality in the Air Basin. While development of the proposed Project would result in short-term regional impacts, Project development would not have a significant long-term impact on the region's ability to meet State and federal air quality standards. The proposed Project would comply with SCAQMD Rule 403 and would implement all feasible mitigation measures for control of PM_{10}, $PM_{2.5}$, and NO_X. Also, the proposed Project would be consistent with the goals and policies of the AQMP for control of fugitive dust. As described in Section IV.B.1, Air Quality of the Draft EIR, the proposed Project's long-term influence would also be consistent with the goals and policies of the AQMP and is, therefore, considered consistent with the SCAQMD's AQMP.

(2) City of Los Angeles Policies

The proposed Project is consistent with applicable policies of the City of Los Angeles Air Quality Element. Development of the proposed Project would implement project features that would reduce vehicular trips, reduce vehicle miles traveled, and encourage use of alternative modes of transportation. Overall, the central location of the proposed Project and its proximity to existing transportation infrastructure and mass transit options would result in a reduction of vehicle miles traveled and vehicle trips. As a result, the proposed Project is consistent with the City of Los Angeles Air Quality Element.

3. **Cumulative Impacts**

a) Construction

Based on the use of standard risk-assessment methodology, construction activities at each related project would not result in a long-term (i.e., 70-year) substantial source of TAC emissions. Additionally, the SCAQMD CEQA guidance does not require a health risk assessment for short-term construction emissions. As such, cumulative toxic emission impacts during construction would be less than significant.

Based on mandatory compliance with SCAQMD rules, odor impacts from the proposed Project are anticipated to be less than significant individually, as well as cumulatively.

b) Operations

With respect to TAC emissions, the related projects (which primarily include retail/commercial, residential, office, and hotel uses) would not represent a substantial source of TAC emissions, which are typically associated with large-scale industrial, manufacturing, and transportation hub facilities. In addition, the proposed Project would not result in any substantial sources of TACs that have been identified by the CARB's Land Use Guidelines, and thus, would not contribute to a cumulative impact.

Potential odor impacts from related projects are anticipated to be less than significant. The proposed Project would not result in odor impacts, and, thus, would not have a cumulative impact.

D. Air Quality—Greenhouse Gas Emissions

1. Construction Impacts

Construction of the proposed Project is estimated to generate a total of 41,631 metric tonnes of CO_2e. As recommended by the SCAQMD, the total GHG construction emissions were amortized over 30 years (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the proposed Project's operational emissions) in order to determine the proposed Project's annual GHG emissions inventory.

2. Operational Impacts

The proposed Project contains numerous project design features that would reduce the proposed Project's GHG emissions profile and would represent improvements versus "business-as-usual" (BAU). The proposed Project would provide a mix of compatible infill and higher density uses to reduce vehicle trips, promote alternatives to individual vehicle travel and promote efficient delivery of services and goods. The proposed Project would also concentrate new employment and retail uses near the Hollywood Freeway and the transportation corridors of Santa Monica Boulevard, Melrose Avenue, and Western Avenue, and in close proximity to public transit opportunities (e.g., light rail and bus routes), thereby minimizing vehicle trips and GHG emissions. Additionally, bicycle amenities such as racks and personal lockers would be expanded at various locations around the Project Site. The proposed Project's GHG emissions reduction of 26 percent compared to the BAU scenario constitutes an equivalent or larger break from BAU than has been determined by CARB to be necessary to meet AB 32's goals (i.e., 16 percent reduction). Therefore, the proposed Project would not have a significant impact on the environment due to its GHG emissions. In addition, the

proposed Project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

3. Project Design Features

In addition to the water conservation, waste reduction, and Transportation Demand Management (TDM) project design features set forth in the MMP, the following project design feature would further reduce GHG emissions from the proposed Project as would compliance with the regulatory measures described in Section IV.B.1, Air Quality, of the Draft EIR:

Project Design Feature B.2-1: Where Leadership in Energy and Environmental Design (LEED®) standards are applicable, the design of new buildings shall include features so as to be capable of achieving current LEED® Certified status.

4. 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 GHG from more than one project and many sources in the atmosphere that may result in global climate change. Overall, the proposed Project has incorporated sustainability design features to reduce vehicle miles traveled and to reduce the proposed Project's potential impact with respect to GHG emissions. The proposed Project, by implementing the project design features, results in a net decrease in GHG emissions that represents a substantial reduction from BAU. The proposed Project's features and GHG reduction measures make the proposed Project consistent with AB 32.

Given the proposed Project's consistency with State and City of Los Angeles GHG emission reduction goals and objectives, the proposed Project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, the proposed Project's impacts are concluded to be less than significant and not cumulatively considerable.

E. Hydrology and Surface Water Quality

1. Surface Water Hydrology

Construction activities for the proposed Project would have the potential to temporarily alter existing drainage patterns and flows by exposing the underlying soils and making the Project Site temporarily more permeable. With preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP), compliance with applicable City grading regulations, and installation of new storm drain facilities, as applicable, construction of the proposed Project would not cause flooding, substantially increase or decrease the amount of surface water in a water body, or result in a permanent, adverse change to the movement of surface water. Therefore, construction of the proposed Project would result in a less than significant impact on surface water hydrology, and no mitigation measures are required.

Given that the Project Site is currently predominantly impervious, the existing drainage areas and patterns on-site would generally be maintained under the proposed Project. While the development of new buildings would alter drainage areas somewhat, the majority of surface and street flows would remain unchanged. The existing drainage areas and patterns would be minimally impacted by the proposed Project due to the existing predominantly impervious nature of the Project Site. With implementation of Project Design Feature F.1-4, there would be no increase in the peak flow rate leaving the Project Site, and the limited increase in stormwater volumes within specific catchment areas would not create a substantial increase in the amount of stormwater in the City system, particularly since there would be an overall reduction in flow volumes sitewide. The proposed Project would not result in a permanent adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. As such, operation of the proposed Project would result in a less than significant impact on surface water hydrology.

2. Surface Water Quality

Construction activities such as earth moving, maintenance/operation of construction equipment, and handling/storage/disposal materials could contribute to pollutant loading in stormwater runoff. With implementation of the construction-related Best Management Practices (BMPs) and compliance with all applicable regulatory requirements, construction of the proposed Project is not anticipated to create pollution, contamination or nuisance as defined in Section 13050 of the California Water Code or cause a regulatory standard to be violated, as defined in the applicable NPDES stormwater permit or the Basin Plan for the receiving water body. Accordingly, construction of the proposed Project would result in a less than significant impact on surface water quality.

As is typical of most major urban developments, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. With respect to dry weather impacts, the existing program of discharging groundwater seepage (dewatering) flows from the catchments would continue following redevelopment of selected areas under the General NPDES Permit No. CAG994004. The proposed Project would implement measures to reduce or eliminate dry weather nuisance flow (e.g., over irrigation, wash water, etc.). Therefore, operation of the proposed Project would result in a less than significant dry weather impact on surface water quality, and no mitigation measures are required. With respect to wet weather impacts, following completion and operation of the proposed Project it is projected that pollutant loads and average concentrations for all constituents would be less than those under baseline conditions with the implementation of structural BMPs sized to address water quality control volume. The proposed Project is not anticipated to create “pollution,” “contamination” or “nuisance” as defined in Section 13050 of the California Water Code or cause a regulatory standard to be violated, as defined in the applicable NPDES stormwater permit or the Basin Plan for the receiving water body. Therefore, operation of the proposed Project would result in a less than significant wet weather impact on surface water quality, and no mitigation measures are required.

3. Project Design Features

Project Design Feature F.1-1: Prior to the issuance of grading permits, the Applicant shall provide the City with evidence that a Notice of Intent has been filed with the State Water Resources Control Board to comply with the Construction

General Permit. Such evidence shall consist of a copy of the Notice of Intent stamped by the State Water Resources Control Board or the Regional Water Resources Control Board, or a letter from either agency stating that the Notice of Intent has been filed.

Project Design Feature F.1-2: For all construction activities disturbing greater than 1 acre or more, prior to receiving a grading permit from the City of Los Angeles, the Applicant shall provide proof of a Waste Discharger Identification Number for filing a Notice of Intent for coverage under the Construction General Permit and a certification that a Stormwater Pollution Prevention Plan has been prepared. For individual construction activities that may occur over time that disturb less than 1 acre, the Applicant shall comply with the applicable City of Los Angeles local requirements.

Project Design Feature F.1-3: Prior to issuance of a building permit for a project that triggers the Standard Urban Stormwater Mitigation Plan requirements, the Applicant shall prepare and submit for review and approval a Standard Urban Stormwater Mitigation Plan that shall include Best Management Practices (e.g., infiltration systems, bio-filtration, structural treatment systems) to the City of Los Angeles Department of Public Works or Department of Building and Safety, as applicable.

Project Design Feature F.1-4: The proposed Project shall include up to three stormwater detention features on-site to reduce the peak flow rate to a level at or below the existing peak flow rate leaving the Project Site and pipe runoff to the City storm drain system (Catchment Area D, G and J). The detention features shall be sized to reduce the peak flow rate from those catchment areas to a level at or below the existing peak flow rates (24.11 cubic feet per second in Catchment Area D, 163.47 cubic feet per second in Catchment Area G, and 11.02 cubic feet per second in Catchment Area J). The potential location of the proposed detention features is shown on Figure IV.F.1-6 of the Draft EIR. The proposed detention feature on the western portion of the Main Lot shall be installed when a new private on-site storm drain is connected to the 21-inch City storm drain in Melrose Avenue. The proposed detention feature in the south central portion of the Main Lot shall be installed when a new private on-site storm drain is connected to the 33-inch City storm drain in Melrose Avenue. The proposed detention feature in the south-eastern portion of the Main Lot shall be installed when a new private on-site storm drain is connected to the 42-inch City storm drain in Melrose Avenue. The proposed detention features shall be located underground and shall consist of either a flow-through or flow-by detention system, or an approved facility that would provide an equivalent reduction in peak runoff flow rate. The exact size and location of the detention features shall be determined prior to construction as final building plans and detailed hydrology reports are completed.

Project Design Feature F.1-5: The Applicant shall continue to require the control of live animals used in production by an animal wrangler to minimize the potential for animal waste to remain on-site.

4. **Cumulative Impacts**

a) Surface Water Hydrology

The identified related projects are generally located in a highly urbanized area, and future land use changes or development are not likely to cause substantial changes in regional surface water flows. In accordance with City requirements, each related project, including Related Project No. 61 (located immediately north of the Project Site on the cemetery property), would be required to implement BMPs to manage stormwater in accordance with Standard Urban Stormwater Mitigation Plan (SUSMP) and Low Impact Development (LID) guidelines, thereby minimizing post-development stormwater flows. Furthermore, the proposed Project would result in an overall reduction in surface water flow volumes sitewide. Therefore, the proposed Project's contribution to cumulative impacts to surface water hydrology would not be cumulatively considerable and, as such, impacts would be less than significant.

b) Surface Water Quality

Because the related projects are generally in an already highly urbanized area, future land use changes or development are not likely to cause substantial changes in regional surface water quality. It is anticipated that these related projects and other future development projects would also be subject to SWPPP and SUSMP requirements and implementation of measures to comply with total maximum daily loads. Therefore, with compliance with all applicable laws, rules and regulations, the proposed Project's contribution to cumulative impacts to surface water quality would not be cumulatively considerable and, as such, impacts would be less than significant.

F. Groundwater

1. Groundwater Hydrology

Groundwater under the Project Site is not currently pumped for beneficial uses (e.g., drinking water, industrial, or agricultural supply). In addition, no water supply wells are located at the Project Site that could be impacted by construction, nor would the proposed Project include the construction of water supply wells. During construction, shallow groundwater could be encountered as close to the surface as approximately 8 to 12 feet below ground surface. As the proposed Project would include below-grade parking facilities, construction activities could encounter groundwater within portions of the Project site and dewatering could be required. Potential dewatering inflows are not anticipated to draw water across any substantial distance and, therefore, would not adversely impact the rate or direction of flow of groundwater supply. In addition, due to the distance from the Project Site to the nearest water supply wells and the temporary nature of any groundwater extracted during construction, construction dewatering would not change potable water levels sufficiently to reduce the ability of water utilities to use the groundwater basin for public water supplies or to reduce yields of adjacent wells or well fields (public or private), and related impacts would be less than significant. Therefore, construction of the proposed Project would result in a less than significant impact on groundwater hydrology, and mitigation measures are not required.

The proposed Project would have no impact on public water supplies, and no reduction in yields of adjacent wells or well fields (public or private) would occur. Project development is not expected to include activities that would require groundwater extraction related to groundwater remediation that could affect groundwater hydrology. Since no water supply wells would be affected and dewatering is not anticipated to adversely impact the rate or direction of flow of regional groundwater (other than localized groundwater flow changes), operation of the proposed Project would result in a less than significant impact on potable water levels. Based on the site-specific land

uses and impervious percentage factors applied to the Conceptual Site Plan, the pervious percentage of the Project Site is expected to increase by 1 percent (to approximately 7 percent pervious or 93 percent impervious) as a result of the proposed Project. From a regional groundwater basin perspective, the potential increase in groundwater recharge resulting from this increase in pervious surface would be limited but beneficial and would result in a less than significant impact. Based on the above, operation of the proposed Project would result in a less than significant impact on groundwater hydrology, and mitigation measures are not required.

2. **Groundwater Quality**

The primary concerns relating to groundwater associated with construction of the proposed Project are: (1) the spillage of hazardous materials from temporary construction equipment and operations; and (2) the effects upon groundwater quality resulting from short-term dewatering activities (i.e., movement of existing contamination). The proposed Project would comply with all applicable federal, state and local requirements concerning the handling, storage, and disposal of hazardous waste, that would reduce the potential for the construction of the proposed Project to release contaminants into groundwater that could affect existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well. Therefore, impacts would be less than significant. No significant areas of groundwater contamination have been identified beneath the Project Site. Furthermore, the estimated rate of groundwater dewatering during construction would not draw groundwater across any substantial distance. Therefore, impacts related to the rate or direction of movement of existing contaminants, the level of groundwater contamination, and regulatory water quality standards would be less than significant. To the extent construction necessitates the removal or relocation of groundwater monitoring wells, with compliance with the well abandonment guidelines set forth in the *Department of Water Resources, California Water Well Standards, Part III, Destruction of Monitoring Wells,* and the California Department of Health Services guidelines, the proposed Project would result in a less than significant impact with respect to the abandonment of any on-site wells, if required. Based on the above, construction of the proposed Project would result in a less than significant impact on groundwater quality, and mitigation measures are not required.

Activities associated with the storage of hazardous materials in underground storage tanks could have a potential impact on groundwater quality during operation of the proposed Project. Compliance with all applicable existing regulations (i.e., the applicable NPDES permit or industrial user sewer discharge permit requirements) at the Project Site and underground storage tank regulatory programs would prevent the proposed Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. Therefore, impacts would be less than significant. Permanent dewatering systems may be required for certain below-ground structures (e.g., subterranean parking). Any dewatering system would be designed and operated in accordance with all applicable regulatory and permit requirements. In addition, no existing significant areas of groundwater contamination have been encountered beneath the Project Site. As such, no significant impact is anticipated to the rate or direction of movement of any existing contaminants beneath the Project Site or the area affected by or the level of groundwater contaminants. Therefore, operational impacts would be less than significant and are not anticipated to violate regulatory water quality standards at an existing production well. Given the estimated rate of groundwater extraction, the distance to the nearest water supply wells, existing groundwater

conditions, and compliance with regulatory requirements, dewatering would not adversely affect existing contaminants, expand the area affected by contaminants, result in an increased level of groundwater contamination, or cause regulatory water quality standards at an existing production well to be violated. Therefore, potential impacts associated with dewatering would be less than significant. Based on the above, operation of the proposed Project would result in a less than significant impact on groundwater quality, and mitigation measures are not required.

3. **Project Design Features**

Project Design Feature F.2-1: Any discharge of groundwater during construction or operation of the proposed Project shall occur pursuant to, and comply with, the applicable National Pollutant Discharge Elimination System permit or industrial user sewer discharge permit requirements. If contaminated groundwater is found during the management of construction or long-term dewatering, treatment and discharge, as appropriate, shall be conducted in compliance with the applicable regulatory requirements (i.e., the Los Angeles Regional Water Quality Control Board General Permit conditions, or the City's industrial user sewer discharge permit requirements).

Project Design Feature F.2-2: In the event a groundwater monitoring well needs to be removed or relocated during construction, the abandonment of the well shall occur in accordance with the guidelines set forth in the *Department of Water Resources, California Water Well Standards, Part III, Destruction of Monitoring Wells*, and the California Department of Health Services guidelines.

Also refer to the project design features set forth in the MMP related to the appropriate handling, storage, and disposal of hazardous materials, which would serve to minimize potential impacts to groundwater.

4. **Cumulative Impacts**

a) Groundwater Hydrology

No water supply wells are located at the Project Site, and the nearest active water well fields are located approximately 4 miles away from the Project Site and approximately 2.5 miles away from the nearest related project. Like the proposed Project, all or most of the related projects would depend on public water supply systems. Given the location of the Project Site and related projects in the area and distance from the existing production wells, the proposed Project's contribution to cumulative groundwater hydrology impacts would not be cumulatively considerable and, therefore, would be less than significant. In addition, the proposed Project would not require groundwater remediation; therefore, no cumulative groundwater impacts would occur. Finally, while the proposed Project's resulting potential increase in groundwater recharge could be considered beneficial, operation of the proposed Project would not result in a measurable increase in local groundwater levels nor would it result in a demonstrable and sustained reduction of groundwater recharge capacity. Therefore, the proposed Project's contribution to groundwater recharge would not be cumulatively considerable and, as such, impacts would be less than significant.

b) Groundwater Quality

As with the proposed Project, with compliance with existing statutes and regulations, the related projects would be unlikely to cause or increase groundwater contamination. Therefore, the proposed Project's contribution to cumulative impacts to groundwater quality would not be cumulatively considerable and, therefore, would be less than significant.

G. Land Use

1. Land Use Consistency

a) Consistency with Local Plans and Applicable Policies

By providing new studio/media/entertainment-related development featuring a combination of rehabilitated historic resources, modernized facilities, and landscaping and pedestrian areas, the proposed Project would complement the area's unique character and employment base and would help ensure the retention of studio-related uses within Hollywood. As such, the proposed Project also would be consistent with the general intent of the General Plan Framework, Hollywood Community Plan, and Wilshire Community Plan.

With regard to zoning, the regulations of the proposed Specific Plan would supplement, and in some cases, supersede those set forth in the Planning and Zoning Code (Chapter 1) of the LAMC. For example, the proposed Specific Plan includes the Historic Resources Preservation Plan that provides guidelines for the rehabilitation (including alteration) and preservation of historic resources within the Main Lot, as well as the construction of new structures within the Main Lot. Project signage would be coordinated and regulated by the proposed signage regulations included in the proposed Specific Plan. Overall, the proposed zoning designation would set forth regulatory controls, via the proposed Specific Plan, that are comparable to existing zoning requirements. Approval of the proposed Specific Plan would more closely align the Project Site with its existing function as a major film and television production facility and allow for more cohesive development between the Main Lot and Ancillary Lots. With implementation of the requested approvals, including adoption of the proposed Specific Plan, zone change, and the proposed signage regulations, land use impacts related to LAMC consistency would be less than significant.

In addition, because the proposed Project would allow for the development of industrial and ancillary commercial uses that are consistent with and would enhance the existing uses within the Project Site and the surrounding area, the proposed Project would be consistent with the City of Los Angeles' Industrial Policy Initiatives and the Industrial Land Use Policy.

b) Consistency with Regional Plans

As analyzed in Section IV.G, Land Use, of the Draft EIR, the proposed Project would be generally consistent with the Southern California Association of Governments' (SCAG's) 2008 Regional Transportation Plan (RTP), Growth Vision Report, 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (2012–2035 RTP/SCS), and Regional Comprehensive Plan (RCP). Additionally, as discussed in Section IV.B.1, Air Quality, of the Draft EIR, the proposed Project would be consistent with the goals and policies of the SCAQMD's Air Quality Management Plan (AQMP). Additionally, as discussed in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, with implementation of all feasible mitigation measures, the proposed Project would not conflict

with the Congestion Management Program (CMP) as it would not result in significant impacts to the nearby CMP intersections or freeway monitoring locations.

c) Conclusion Regarding Impacts Relative to Land Use Consistency

With approval of the proposed Specific Plan, zone change, and either General Plan Amendment (redesignating the Ancillary Lots to General Commercial or resdesignating the entire Project Site to Regional Center or Regional Commercial), the proposed Project would not be in substantial conflict with the adopted Community Plans or with relevant environmental policies in other applicable plans. As such, the proposed Project's impacts related to land use consistency would be less than significant.

2. **Land Use Compatibility**

The surrounding uses were developed over a span of several decades and feature a variety of building types and architectural styles. The eclectic nature of the surrounding uses and their associated architecture results in a non-cohesive visual character within the area. The infill of new studio-related uses that are substantially similar in terms of land use type to the existing studio-related uses within the Project Site would be compatible with the varied land uses that characterize the Project area. Overall, the proposed Project's density would be compatible with the densely developed nature of the surrounding area. The majority of the building heights across the Project Site would be substantially similar to other buildings in the Project vicinity, such as the four-story Raleigh Studios and other existing structures that would remain on the Project Site. The proposed high-rise structures would be compatible with the overall character of the Hollywood area, where high-rise buildings are common along many streets, such as Hollywood Boulevard, Vine Street/Rossmore Avenue, and Sunset Boulevard. By focusing density and activating the pedestrian realm along Melrose Avenue, the proposed Project would strengthen the Studio's identity and create a greater sense of place along this important frontage. Overall, the land uses proposed on the Ancillary Lots, as detailed in the Conceptual Site Plan, would be compatible with surrounding development in terms of land use type, development density, building height, and overall design. Furthermore, the proposed Project design would improve and enhance the visual character of the Project Site as compared with existing conditions, promoting compatibility with surrounding uses. In general, the proposed signage regulations would regulate signage while providing sufficient flexibility to meet the unique needs of the proposed Project, with an overarching goal of ensuring that Project signage is integrated with and enhances the character of the Project Site as an important entertainment industry venue.

The proposed Project is considered compatible with the surrounding area in terms of both land use type and design. As such, the proposed Project would not substantially and adversely change the existing land use relationships between the Project Site and existing off-site uses. Furthermore, the proposed Project would not disrupt, divide, or isolate any existing neighborhoods or communities. As such, the proposed Project's impacts related to land use compatibility would be less than significant.

3. **Project Design Features**

Other than the proposed Specific Plan regulations, no project design features relevant to land use are proposed.

4. **Cumulative Impacts**

Future development projects would be subject to existing zoning and land use designations as well as environmental review by the City. Therefore, such future projects are not expected to fundamentally alter the existing land use relationships in the community. Rather, the concentration of development in the area would make use of infill opportunities within an area well served by transit, thus promoting a more cohesive and compatible urban environment.

Two projects, Related Project No. 24 and Related Project No. 61, are in close enough proximity to the Project Site so as to contribute to cumulative land use impacts by potentially altering existing land use relationships. The balance of the related projects would not cause cumulative land use impacts due to either distance and/or existing intervening development. Related Project No. 24, located at 5663 Melrose Avenue, involves the construction of 96 multi-family residential dwelling units and 3,350 square feet of retail uses.[2] This type of development would be substantially similar to other land uses in the Project vicinity. Related Project No. 61 proposes additional cemetery-related uses within the cemetery immediately north of the Project Site. These uses would be consistent with existing development on the cemetery property. Thus, these related projects would not combine with the proposed Project and the interim projects to create any inconsistency with land use plans or policies, nor any incompatibility with surrounding land uses. Additionally, given that the proposed Project would be compatible with existing surrounding land uses, the proposed Project would not contribute to significant cumulative land use compatibility impacts. Cumulative impacts would be less than significant.

H. Noise (Operational)

1. On-Site Stationary Noise Sources

a) Building Mechanical Equipment

Operation of the proposed Project would require building mechanical equipment to condition and ventilate the indoor air environment. Project building mechanical equipment would comply with the City's Noise Regulation requirements, which would limit the noise from building mechanical equipment not to exceed 5 dBA above the ambient noise levels at the off-site noise sensitive receptors. As such, noise impacts from building mechanical equipment would be less than significant.

b) Parking Facilities

Noise associated with below-grade parking garages (e.g., car movements, horns and alarms) would be contained within the structures, and, thus, noise levels would be effectively shielded from the off-site noise sensitive receptor. Therefore, impacts associated with the below-grade parking garages would be less than significant. Noise sources associated with above-grade parking facilities include activation of car alarms, sounding of car horns, slamming of car doors and tire squeals. The estimated maximum noise level from parking-related operations at off-site sensitive receptor locations within 100 feet of a parking structure would exceed the proposed Project's significance threshold for parking operations due to the potential for intermittent car alarms

[2] Construction of Related Project No. 24 has been completed.

or horns. However, a project design feature would be implemented as part of the proposed Project that would integrate noise control features into the parking structure façade within 100 feet of an off-site sensitive receptor. With implementation of the project design features, operational noise impacts due to the use of parking facilities would be less than significant.

c) Loading Dock Areas

Based on measured noise levels from typical loading dock facilities, delivery trucks would generate noise levels of approximately 71 dBA (L_{eq}) at a distance of 50 feet. However, a project design feature would be implemented as part of the proposed Project to locate and construct new buildings with loading docks such that the line of sight between the outdoor loading dock and any adjacent noise sensitive land use will be obstructed to the extent necessary to comply with the LAMC noise requirements. With implementation of the project design feature, noise levels related to typical loading and unloading activities would be contained or shielded and such impacts would be less than significant.

d) Studio-Related Operations

The proposed Project is not anticipated to include any new types of uses or activities beyond those occurring within the Project Site today. Outdoor production, including intermittent use of pyrotechnics and use of portable generators, already occurs within the Project Site. The proposed Project would include a net increase in stage and support uses. The stage shell structures are designed to provide sound insulation required to meet the intended functions (e.g., film production). Sound generation within the interior of the stages would be contained within the sound insulated stages. As such, noise impacts associated with the operation of proposed stages and support uses would be less than significant.

Currently, outdoor production occurs at various locations within the Main Lot and at the Ancillary Lots. Outdoor production within the Main Lot may potentially increase with Project build-out. As described in greater detail in Section IV.H, Noise, of the Draft EIR, noise levels were calculated with outdoor production occurring within the Main Lot locations closest to off-site sensitive receptors. The estimated noise levels from the future outdoor productions when compared with the current production noise levels would result in a maximum increase of 0.8 dBA (receptor R9). The future outdoor production noise levels when added to the existing ambient noise levels would result in a maximum increase of 0.7 dBA (receptor R13), which would be below the significance threshold of 3 dBA above ambient noise levels. Therefore, noise impacts associated with the projected increase in outdoor production activities would be less than significant.

e) Special Events

Special events would continue to occur on the Project Site consistent with existing conditions. The principal noise sources associated with special events include amplified sound equipment. Project Design Feature H-5 is included to address the sound level outputs from amplified sound equipment associated with special events. As such, noise impacts associated with the special events would be less than significant.

2. **Off-Site Traffic (Mobile Sources)**

a) Future plus Project

Future roadway noise levels were calculated along 46 off-site roadway segments in the vicinity of the Project Site. Project traffic would result in a maximum of a 1.0 dBA (CNEL) increase in traffic noise along Van Ness Avenue between Santa Monica Boulevard and Lemon Grove Avenue. This maximum projected increase in noise levels is below the 3 dBA CNEL significance threshold. Therefore, off-site traffic noise impacts associated with the proposed Project would be less than significant.

b) Existing plus Project

When compared with the existing conditions, Project traffic would result in a maximum of a 1.0 dBA (CNEL) increase in traffic noise along Van Ness Avenue between Santa Monica Boulevard and Lemon Grove Avenue. Thus, the estimated increase in off-site traffic noise levels would be below the 3 dBA CNEL significance threshold. Therefore, off-site traffic noise impacts associated with the Existing plus Project condition would be less than significant.

3. **Composite Noise Level Impacts from Proposed Project Operations**

An evaluation of noise from all the proposed Project's operational noise sources (i.e., composite noise level) was conducted. Primary noise sources associated with the typical daily operation of the proposed Project would include additional on-site mechanical/electrical equipment; parking facilities, loading dock areas, and studio-related operations; and the anticipated increase in the traffic volumes on nearby roadways. The proposed Project is estimated to increase the ambient sound level at the off-site noise-sensitive receptors from 0.1 dBA (receptors R8 and R9) to a maximum of 2.4 dBA (receptors R1 and R11), relative to the existing ambient noise environment. The estimated increases would be below the more stringent significance threshold of 3 dBA above ambient at all off-site sensitive receptors. As such, the composite noise level impacts due to operations of the proposed Project would be less than significant.

4. **Project Design Features**

Project Design Feature H-3: All Project outdoor loading dock and trash/recycling areas shall be located or constructed such that the line of sight between these noise sources and any adjacent noise sensitive land use shall be obstructed to the extent necessary to comply with Los Angeles Municipal Code noise requirements.

Project Design Feature H-4: Non-squeal paving finishes shall be used within the proposed Project's new parking structure(s).

Project Design Feature H-5: Special events in the Main Lot that include an outdoor amplified sound system shall implement the following noise-management procedures:

- Prior to the special event, Paramount personnel shall test the sound level at the event speaker locations to confirm that the sound levels from the event's amplified sound equipment are consistent with applicable Los Angeles Municipal Code requirements as directed by a qualified acoustical engineer.

- Once the event has commenced, Paramount personnel shall test the sound levels from the event speakers to confirm that the sound levels from the amplified sound equipment are consistent with applicable Los Angeles Municipal Code requirements.
- Paramount shall provide surrounding residents with a phone number to call during the special event with any concerns regarding the amplified sound levels

Project Design Feature H-6: Project mechanical equipment for new buildings located along the Main Lot northern property line shall be designed not to exceed 45 dBA (in terms of hourly L_{eq}) as measured at the northern property line.

Project Design Feature H-7: If a new above ground parking structure is constructed within 100 feet of an off-site noise sensitive receptor, the façade facing the receptor shall be designed with noise control features (e.g., acoustical louvers or solid parapet wall) so as to reduce noise to within 10 dBA above ambient.

5. Cumulative Impacts

Due to provisions set forth in the LAMC 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. Furthermore, mitigation measures (if required) for each related project would be implemented to ensure compliance with the LAMC. In addition, with implementation of the project design features, noise impacts associated with operations within the Project Site would be less than significant. Therefore, cumulative stationary source noise impacts associated with operation of the proposed Project and related projects would be less than significant.

Cumulative traffic volumes would result in a maximum increase of 1.3 dBA CNEL along Gower Street, north of Hollywood Boulevard. At all other analyzed roadway segments, the increase in cumulative traffic noise would be lower. Thus, all of the cumulative noise level increases would be less than the significance threshold of a 3-dBA difference in calculated traffic noise levels. As such, cumulative noise impacts due to off-site mobile noise sources would be less than significant.

I. Employment

1. Construction

It is estimated that approximately 4,480 part-time and full-time jobs would be directly associated with the construction of the proposed Project. These direct jobs would support another 2,784 indirect and induced jobs in a wide range of industries throughout the City resulting from purchases of construction-related supplies, goods and services, and household expenditures by direct and indirect employees. As such, the proposed Project would provide new direct and indirect employment opportunities during the construction period. Therefore, impacts related to construction employment would be less than significant.

2. Operations

It is estimated that the proposed Project would add 5,493 new direct on-site jobs once all proposed improvements have been constructed and are in full operation. The additional 5,493 full

and part-time jobs directly associated with annual operation of the completed proposed Project represents approximately 0.27 percent of projected 2038 employment in the City of Los Angeles Subregion, and 2.92 percent of employment growth between 2011 and 2038. The proposed Project is therefore consistent with SCAG's forecast for the City of Los Angeles Subregion. Based on the above, the proposed Project would not cause growth (i.e., new employment) nor accelerate development in an undeveloped area that exceeds projected/planned levels for the year of Project buildout. Therefore, impacts related to employment consistency with SCAG's forecast for the City of Los Angeles Subregion would be less than significant and no mitigation measures are required.

3. Cumulative Impacts

The sum of direct, indirect, and induced proposed Project employment is projected to total an estimated 12,647 full-time and part-time jobs across a wide range of industry sectors. Although these jobs would be spread over the entire City, the proposed Project's total employment impact would still fall within SCAG's employment growth forecast for the City of Los Angeles Subregion in 2038 (i.e., 2,058,038 jobs), and forecasted employment growth over the period 2011–2038 (188,433 jobs). The cumulative employment , including direct, indirect, and induced Project employment, employment associated with interim project and employment associated with the specified related projects is projected total an estimated 18,467 full-time and part-time jobs. This cumulative employment represents approximately 0.9 percent of 2038 employment in the City of Los Angeles Subregion; and the cumulative employment impact accounts for 9.8 percent of the employment growth forecast in the Subregion through 2038. Therefore, the proposed Project's incremental employment effect would not be cumulatively considerable within the meaning of CEQA, and, hence, its cumulative employment impact would be less than significant and no mitigation measures are required.

J. Housing

1. Construction

Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely, to any notable degree, to relocate their households as a consequence of the construction job opportunities presented by the proposed Project. Thus, there would not be any significant housing impacts on household growth in the City of Los Angeles Subregion due to proposed Project construction. Therefore, construction-related impacts related to housing would be less than significant.

2. Operations

The proposed Project would not include any new residential development. The proposed Project also would not remove any existing housing because no housing is located on the Project Site. Therefore, there would be no direct housing impacts.

The 5,189 net new office and studio production direct jobs (5,493 direct jobs minus 304 retail jobs) are estimated to result in an indirect housing/household demand associated with the proposed Project of approximately 2,589 housing units/households. The proposed Project's estimated 2,589 indirect households/housing units represent about 0.16 percent of the households forecasted for 2038 in the City of Los Angeles Subregion, or about 1.0 percent of the extrapolated growth

forecasted between 2011 and 2038. Therefore, the proposed Project would not induce substantial housing growth, because it would account for a limited portion of forecasted household growth rather than exceeding the housing growth forecast for the City of Los Angeles Subregion. The proposed Project is also compatible with relevant adopted local and regional housing and household growth policies, as discussed in Section IV.I.2, Housing, of the Draft EIR. Therefore, impacts related to housing would be less than significant.

3. Cumulative Impacts

An indirect housing growth of 2,589 housing units/households would be associated with the direct new jobs generated by the proposed Project. As discussed in Section IV.I.3, Housing, of the Draft EIR, cumulative households (i.e., total proposed Project households plus interim projects households plus related projects households) represents approximately 0.27 percent of 2038 households in the City of Los Angeles Subregion; and the cumulative households impact accounts for approximately 1.72 percent of the household growth forecast in the City of Los Angeles Subregion through 2038. Therefore, the proposed Project's incremental housing impact would not be cumulatively considerable within the meaning of CEQA, and, hence, its cumulative housing impact would be less than significant and no mitigation measures are required.

K. Population

1. Construction

As discussed in Section IV.I.2, Housing, of the Draft EIR, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely, to any notable degree, to relocate their households as a consequence of the construction job opportunities presented by the proposed Project. Thus, there would not be any significant population impacts related to household growth in the City of Los Angeles Subregion due to Project construction. Therefore, construction-related impacts related to population would be less than significant and no mitigation measures are required.

2. Operations

The proposed Project would not include any new residential development and therefore would have no direct population impacts. As discussed in Section IV.I.2, Housing, of the Draft EIR, jobs associated with the proposed Project's commercial uses could create an indirect demand for approximately 2,589 housing units/households. It is estimated that the indirect Project housing demand could result in an indirect population increase of 7,092 persons. The 7,092 persons associated with indirect housing demand from the proposed Project's office and studio production uses would represent approximately one-fifth of 1 percent of the population forecasted for 2038 in the City of Los Angeles Subregion, and 1.8 percent of population growth forecasted between 2011 and 2038. The proposed Project would be consistent with all City and regional population policies, including jobs/housing balance. Therefore, the proposed Project would not induce substantial population growth, nor would it exceed the population forecast for SCAG's City of Los Angeles Subregion. Therefore, impacts related to population would be less than significant.

3. Cumulative Impacts

The cumulative population associated with the proposed Project (i.e., total population associated with the proposed Project plus interim projects population plus related projects population) represents approximately 0.26 percent of 2038 population in the City of Los Angeles Subregion; and the cumulative indirect population growth accounts for approximately 2.97 percent of the population growth forecast in the City of Los Angeles Subregion through 2038. Therefore, the proposed Project's associated incremental population impact would not be cumulatively considerable within the meaning of CEQA, and, hence, its cumulative population impact would be less than significant and no mitigation measures are required.

L. Public Services—Schools

1. Proposed Project Impacts

As no residential uses would be developed as part of the proposed Project, implementation of the proposed Project would not result in a direct increase in the number of students within the service area of the Los Angeles Unified School District (LAUSD). Based on application of the LAUSD student generation rates to the land uses under the proposed Project, the proposed Project could indirectly generate approximately 992 elementary school students, approximately 248 middle school students, and approximately 496 high school students, for a total of approximately 1,736 students. For the purposes of providing a conservative analysis, it is assumed that these students would attend the LAUSD schools within the vicinity of the Project Site, rather than schools further away or private schools. Based on this conservative assumption, the elementary school students indirectly generated by employees at the Project Site would attend Van Ness Avenue Elementary School, Vine Street Elementary School, or Santa Monica Boulevard Community Charter School. The middle school students indirectly generated by employees at the Project Site would attend Joseph Le Conte Middle School or Bancroft Middle School. The high school students indirectly generated by employees at the Project Site would attend Fairfax High School or the Helen Bernstein High School Complex. Based on the future capacity and enrollment data provided by the LAUSD, and conservatively assuming that all students indirectly generated by employees at the Project Site would attend each of these schools, with the exception of Vine Street Elementary School, each school is anticipated to have sufficient capacity to accommodate the students indirectly generated by Project Site employees. Pursuant to Senate Bill 50, the Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered mitigation of Project-related school impacts. Therefore, impacts on schools during operation of the proposed Project would be less than significant and mitigation measures are not required.

2. Cumulative Impacts

A number of the identified related projects and ambient growth projections fall within the attendance boundaries of the LAUSD. LAUSD has implemented the New School Construction Program which has delivered more than 170,000 seats. Furthermore, as with the proposed Project and the interim projects, future development, including the related projects, would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits pursuant to Senate Bill 50. Pursuant to Government Code Section 65995, the payment of these fees would be considered mitigation of school impacts generated by the related projects.

M. Public Services—Parks and Recreation

1. Construction Impacts

Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the proposed Project. Further, it is anticipated that construction workers would use their breaks for lunch rather than for using parks and recreational facilities. Therefore, Project construction would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services, nor would Project construction interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project area. As such, impacts on parks and recreation facilities during Project construction would be less than significant, and mitigation measures are not required.

2. Operations Impacts

The proposed Project would not develop residential uses that would directly generate the need for additional park and recreational facilities. In addition, the proposed Project would provide for expanded private on-site open space and recreational amenities to serve the recreation and leisure needs of Paramount employees and guests. Further, while the proposed Project's employment opportunities would have the potential to indirectly increase the population of the Hollywood and Wilshire Community Plan areas, new demand for public parks and recreational facilities would be limited. Therefore, operation of the proposed Project would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services, or interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project area. Impacts on parks and recreation facilities during operation of the proposed Project would be less than significant, and mitigation measures are not required.

3. Consistency with Regulations

a) Public Recreation Plan

The standards of the Public Recreation Plan are generally applied to projects that include a residential component, as residential uses generate the highest demand for public parks and recreational facilities. Commercial developments, such as the proposed Project, typically do not generate the need for additional public parks and recreational facilities, as the potential use of such facilities by commercial employees is generally minimal. Notwithstanding, the proposed Project would provide for expanded private on-site open space and recreational amenities to serve the recreation and leisure needs of employees and guests at Paramount Studios. Thus, the impacts of the proposed Project with regard to consistency with the Public Recreation Plan would be less than significant.

b) Los Angeles Municipal Code

As the proposed Project does not include the development of residential uses on-site, it would not be subject to the open space and park dedication requirements set forth in Section 12.21

and Section 17.12 of the LAMC. Therefore, the proposed Project would result in no impacts with regard to compliance with applicable sections of the LAMC.

c) Hollywood and Wilshire Community Plans

The proposed Project would support the objectives and policies of the Community Plans through the provision of private open space and landscaping on-site, which would offset the demand for public parks and recreation space that could be generated by the proposed Project's net new employees. In addition, Project development would not diminish the quality or accessibility or result in the removal of existing parks and recreational facilities within 2 miles of the Project Site. As such, impacts with respect to consistency with the Hollywood and Wilshire Community Plans would be less than significant.

4. Cumulative Impacts

A number of the identified related projects and ambient growth projections fall within a 2-mile radius of the Project Site, the geographic area analyzed for purposes of assessing impacts to parks and recreational facilities. The City is currently providing, on average, 0.76 acre of neighborhood and community parks per 1,000 residents, which is below the Public Recreation Plan's standards for neighborhood and community parks. As the population continues to grow in the Project area, increased demand would lower the existing parkland to population ratio if new facilities are not constructed. As with the proposed Project, the related projects would undergo discretionary review on a case-by-case basis and would be expected to coordinate with the Department of Recreation and Parks. Future development projects would also be required to comply with the park and recreation requirements of the Public Recreation Plan and Sections 12.21 and 17.12 of the LAMC, as applicable. In addition, as the proposed Project would not generate a direct increase in residential population, the demand for additional park and recreational facilities generated by Project employees and the potential indirect residential population growth would be minimal. Thus, the cumulative parks and recreation impacts of the proposed Project, interim projects, and related projects would be less than significant.

N. Public Services—Libraries

1. Construction

Construction employment generated by the proposed Project would not result in a notable increase in resident population or a corresponding demand for library services in the vicinity of the Project Site. In addition, it is unlikely that construction workers would utilize Project area libraries on their way to/from work or during their lunch hours. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible and impacts on library facilities during Project construction would be less than significant.

2. Operations

The 7,361-square-foot John C. Fremont Library does not meet the building size standard set forth in the 2007 Branch Facilities Plan Criteria for New Libraries, while the 19,000-square-foot Goldwyn-Hollywood Regional Library does meet the applicable size standard. Notwithstanding, the LAPL has indicated that both libraries meet the current demand for library services in their respective

service areas. Additionally, five other LAPL branch libraries are located within 2 miles of the Project Site. To the extent that the proposed Project's employees and/or indirect population generate an additional demand for library services, these libraries would assist in meeting that demand. Therefore, given that: (1) the two primary libraries that would serve the proposed Project are adequately meeting the demand for library services in the Project area, (2) the proposed Project does not include residential uses, which are the primary metric used by the LAPL for assessing the adequacy of library services and planning for future growth, and (3) Project employees and the potential indirect population generation that could be attributable to those employees would generate minimal demand for library services, the proposed Project would not exceed the capacity of local libraries to adequately serve the existing residential service population. As such, impacts on library facilities during operation of the proposed Project would be less than significant, and mitigation measures are not required.

3. Cumulative Impacts

The John C. Fremont Library, constructed in 1927, is 7,361 square feet in size and, therefore, does not meet the building size standard set forth in the 2007 Branch Facilities Plan Criteria for New Libraries. As such, while the LAPL has indicated that the library meets the current demand for library services in its service area, it is conservatively assumed that the John C. Fremont library may not be adequate to serve the residential service area population upon proposed Project buildout in 2038, based on current LAPL size standards. The 2007 Branch Facilities Plan also provides a building size standard for Regional Libraries of up to 20,000 square feet. Thus, the 19,000-square-foot Goldwyn-Hollywood Regional Library would remain adequate upon Project buildout in 2038 pursuant to the building size standard set forth in the 2007 Branch Facilities Plan Criteria for New Libraries. As with the proposed Project, future development, including the related projects, would undergo discretionary review on a case-by-case basis and would be expected to coordinate with the LAPL. Furthermore, the Goldwyn-Hollywood Regional Library as well as the several other branch libraries located within a 2-mile radius of the Project Site, including the Wilshire Library, Will & Ariel Durant Library, Cahuenga Library, Pio Pico–Koreatown Library, and Fairfax Library, would alleviate increased demand on the John C. Fremont Library. The proposed Project would not generate a direct increase in residential population, and the demand for library services generated by Project employees and potential indirect residential population growth would be minimal. Therefore, the proposed Project's impacts on the John C. Fremont Library and the Goldwyn-Hollywood Regional Library would not be cumulatively considerable, and the cumulative library impacts of the proposed Project, interim projects, and related projects would be less than significant.

O. Traffic (Congestion Management Plan, Transit System Capacity, Project Access, Parking)

1. Congestion Management Plan (CMP)

Only one arterial monitoring intersection, Western Avenue & Santa Monica Boulevard, is forecasted to have over 50 trips added by Project traffic during either peak hour. This intersection is expected to operate at LOS E during both the weekday morning and afternoon peak hours under Existing with Project conditions and under Future with Project conditions. As the intersection would not operate at LOS F during any peak hour, no significant traffic impact would occur according to CMP criteria and no mitigation is required.

As the proposed Project would not add 150 trips in either direction during either peak hour, no CMP freeway segments impact would occur and no additional freeway analysis is required under CMP criteria for existing or future conditions.

2. **Transit System Capacity**

With regard to transit system capacity, the proposed Project is forecasted to generate a total of 5,061 daily transit trips, including 521 morning peak-hour transit trips and 556 afternoon peak-hour transit trips. The anticipated transit demand from the proposed Project would be more than satisfied by the existing capacity surplus and the proposed Project is not expected to significantly impact the regional transit system under existing conditions. In addition, the anticipated future transit demand from the proposed Project would be more than satisfied by an estimated future capacity surplus, and the proposed Project is not expected to significantly impact the regional transit system under future conditions.

3. **Project Access**

The proposed Project's Conceptual Site Plan indicates that vehicular access to the Project Site would be modified and improved in a number of ways, as discussed in Section IV.K, Traffic, Access, and Parking, of the Draft EIR. Internal circulation within the Main Lot would be improved through widening and connecting of the existing avenues and alleys through the Project Site. With the removal of some buildings and the construction of new ones in strategic locations, the Main Lot's configuration will enhance circulation for vehicles, pedestrians, and bicycles. Additionally, the construction of structured parking would help to reduce passenger vehicle traffic on the Main Lot, which will enhance safety and improve conditions for pedestrians and bicycles. Circulation within and among the Ancillary Lots would be largely unchanged with implementation of the proposed Project. All of the intersections nearest to the proposed driveways would operate at LOS D or better under both Existing with Project and Future with Project conditions. In addition, no access impacts related to bicycle, pedestrian, or vehicular safety are expected to result due to the design or placement of Project access points. Therefore, Project operational access impacts would be less than significant.

4. **Parking**

During construction, an adequate number of on-site parking spaces for construction workers would be available at all times on the Project Site or the proposed Project would provide a shuttle to an off-site parking location for the construction workers. Thus, Project construction would result in a less than significant impact with regard to the availability of parking spaces. Operational parking requirements developed specifically for the Project Site are set forth in the proposed Specific Plan. Based on these requirements and the Conceptual Site Plan configuration of uses, the proposed Project would provide approximately 7,550 parking spaces, which exceeds the amount of parking required by the LAMC, as well as the forecasted peak parking demand for 7,547 spaces. Therefore, Project impacts with regard to parking would be less than significant. In addition, as discussed above, it is noted that the Project's parking impacts would not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099.

5. **Cumulative Impacts**

a) CMP

The proposed Project's contribution to cumulative traffic would result in less-than-significant LOS impacts at the CMP arterial monitoring station located at Western Avenue and Santa Monica Boulevard (Intersection No. 54). Further, as this intersection does not operate at LOS F during either peak hour under cumulative conditions, cumulative impacts would be less than significant. As the proposed Project would not add 150 trips in either direction during either peak hour, no CMP freeway segments impact would occur and as a result the proposed Project's contribution to cumulative impacts would not be cumulatively considerable. Thus, cumulative impacts to CMP locations would be less than significant.

b) Transit System Capacity

Implementation of the proposed Project in conjunction with cumulative conditions would increase the demand for transit in the Study Area. As discussed above, when accounting for the proposed Project and future growth through Project buildout, the anticipated future transit demand from the proposed Project would be more than satisfied by the capacity surplus. Thus, the proposed Project would not result in transit impacts that would be cumulatively considerable.

c) Project Access

Implementation of the proposed Project in conjunction with interim projects, some of the related projects and regional growth (depending on proximity to the Project Site) would increase the amount of traffic in the Project area. The analysis of the Future-with-Project condition reflects both Project-specific and future cumulative traffic impacts related to intersection LOS in the Study Area, because the Future-with-Project condition considers a combination of existing traffic conditions, plus traffic from regional growth and related projects, and Project traffic. This analysis concluded that the proposed Project would result in less than significant impacts related to Project access, and bicycle, pedestrian, and vehicular safety. Therefore, the proposed Project's cumulative impacts would not be cumulatively considerable, and are concluded to be less than significant.

d) Parking

The parking demands associated with the proposed Project would not contribute to the cumulative demand for parking in the vicinity of the Project Site as a result of development of the proposed Project and related projects. The majority of the related projects are sufficiently separated from the Project Site such that they would not share parking supplies. Also, pedestrian access to the Project Site is controlled to select locations. Thus, visitors and employees associated with the proposed Project are not likely to park elsewhere due to geographic and access limitations. Additionally, the proposed Project's demand for parking would be accommodated on-site. Therefore, cumulative parking impacts would be less than significant.

P. Utilities and Service Systems—Water Supply

1. Construction

The water demand generated by construction activities for the proposed Project would be substantially less than the net new water consumption of the proposed Project at buildout, and is not

anticipated to have any adverse impact on available water supplies and infrastructure. In addition, such water demand would be temporary in nature. The proposed Project would implement Project Design Feature L.1-1 related to water infrastructure, including the on-site construction of water facilities (related to domestic water and fire protection) along with off-site connections to the water distribution lines in Melrose Avenue, Gower Street and Ridgewood Place. The design and installation of new water lines would meet applicable City standards as set forth in the City Plumbing Code. Most construction impacts are expected to be confined to trenching for water lines and would be temporary in nature. With implementation of the construction traffic management plans pursuant to Project Design Feature K-2, construction-related impacts to water supply and infrastructure would be less than significant.

2. **Operation**

Buildout of the proposed Project uses would result in a net increase of approximately 239,569 gallons per day or 268 acre-feet per year in potable water demand. As set forth in the Water Supply Assessment for the proposed Project provided in Appendix S of the Draft EIR, the LADWP Board found that the proposed Project falls within the projected water supplies for normal, single-dry, and multiple-dry years and that it will be able to meet the water demand for the proposed Project, as well as existing and planned water demands of its future service area. The estimated water demand for the proposed Project would not exceed the available supplies projected by LADWP. Thus, LADWP would be able to meet the water demand of the proposed Project, as well as the existing and planned future water demands of its service area. Therefore, operation-related impacts to water supply would be less than significant.

Water service to the Project Site would continue to be supplied by the LADWP for domestic and fire protection uses. The proposed Project would increase the demand for domestic and fire water and would require the construction of additional domestic and fire water lines. With implementation of Project Design Feature L.1-1 and Project Design Feature J.2-4, the necessary on-site infrastructure and connections to the LADWP system would be constructed, and the proposed Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site. Therefore, operation-related impacts to water infrastructure would be less than significant.

3. **Project Design Features**

Project Design Feature L.1-1: New on-site water mains and laterals would be installed in accordance with City Plumbing Code requirements, where necessary, to distribute water within the Project Site.

Project Design Feature L.1-2: The proposed Project would implement the following water conservation features:

For proposed outdoor areas of the proposed Project:

- Expanded use of high-efficiency irrigation systems, including weather-based irrigation controllers with rain shutoff technology or smart irrigation controllers for any area that is either landscaped or designated for future landscaping. Drip or subsurface irrigation shall be utilized.

- Use of water efficient landscaping, such as proper hydro-zoning, turf minimization, zoned irrigation and use of native/drought-tolerant plant materials within the Project Site. At least 25 percent of new landscaping areas shall use drought-tolerant plants.
- Use of landscaped contouring in areas other than production areas and visitor entry points.
- Provide education on water conservation to employees.

For proposed indoor areas of the proposed Project:

- High-efficiency toilets with flush volume of 1.0 gallon of water per flush.
- High-efficiency urinals that use 0.125 gallon per flush or less.
- Indoor faucets that use 1.5 gallons per minute or less.
- Pre-rinse spray valves that use 1.6 gallons per minute or less.
- All installed dishwashers shall be Energy Star rated.
- Shower stalls shall have no more than one showerhead per stall.
- High-efficiency clothes washers with a water savings factor of 7.5 or less.
- Tankless and on-demand water heaters.
- Domestic water heating system.
- Standardized bottleless water filters for drinking water.
- Cooling tower conductivity controllers or cooling tower pH conductivity controllers. Cooling towers shall operate at a minimum of 5.5 cycles of concentration.

4. **Cumulative Impacts**

Based on LADWP's 2010 Urban Water Management Plan (UWMP) water demand projections through 2035, and the service area reliability assessment conducted by the LADWP in its UWMP, LADWP determined that it will be able to reliably provide water to its customers through the year 2035. Furthermore, as indicated by the Water Supply Assessment, the LADWP Board found that that it will be able to meet the water demand for the proposed Project as well as existing and planned water demands of its future service area. Thus, it is anticipated that LADWP would be able to supply the demands of the proposed Project, the interim projects, the related projects, and future growth through 2035. Continued efforts by LADWP to secure the reliability of water supplies in the future, combined with project-specific requirements to conduct analyses to ensure the availability of sufficient water supply to meet demand, are expected to continue through 2038 and beyond. Therefore, cumulative impacts on water supply would be less than significant.

Similar to the proposed Project, new development projects would be subject to LADWP review to assure that the existing public utility facilities would be adequate to meet the domestic and fire water demands of each project, and individual projects would be subject to LADWP and City requirements regarding infrastructure improvements needed to meet respective water demands, flow and pressure requirements, etc. Therefore, cumulative impacts on the water infrastructure system would be less than significant.

Q. Utilities and Service Systems—Wastewater

1. Construction

Wastewater generation would occur incrementally throughout construction of the proposed Project (i.e., up to 2038). However, such use would be temporary and nominal when compared with the wastewater generated by an occupied permanent building. Thus, wastewater generation from proposed Project construction activities is not anticipated to cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained. For these same reasons, construction of the proposed Project is not anticipated to generate wastewater flows that would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Integrated Resources Plan. Construction impacts (including, but not limited to, street, traffic detouring and control, and impacts to other utilities) would be confined along Melrose Avenue and streets adjacent to the Ancillary Lots. With implementation of Project Design Feature K-2, which would require the implementation of construction traffic management plans, construction impacts to the wastewater system would be less than significant and no mitigation measures are required.

2. Operation

The proposed Project is estimated to generate an average net wastewater flow of 0.226 million gallons per day (0.350 cubic foot per second) and a peak wastewater flow of 0.660 million gallons per day (1.021 cubic feet per second). In terms of wastewater conveyance, there is sufficient capacity to accommodate the increased flows from the proposed Project, and the proposed Project would have a less than significant impact on the City's main sewer lines serving the Project Site. The proposed Project would not cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained. Impacts with respect to wastewater generation and infrastructure would be less than significant and mitigation measures are not required.

The Hyperion Treatment Plant has the capacity to accommodate the additional wastewater flows from the proposed Project. The proposed Project's net increase in average daily wastewater flow of 0.226 million gallons per day would equate to less than one percent of the current available capacity of the Hyperion Treatment Plant. Therefore, the proposed Project-generated wastewater would be accommodated by the existing capacity of the Hyperion Treatment Plant and a less than significant impact would occur. In addition, the proposed Project's net increase in average daily wastewater generation of 0.226 million gallons per day would represent approximately 0.04 percent of the Hyperion Service Area's assumed future capacity of 550 million gallons per day and approximately 0.05 percent of the Hyperion Treatment Plant's assumed future capacity of 450 million gallons per day. Therefore, the proposed Project's additional wastewater flows would not substantially or incrementally exceed the future scheduled capacity of any treatment plant by generating flows greater than those anticipated in the Integrated Resources Plan. Impacts with respect to wastewater treatment capacity would be less than significant and mitigation measures are not required.

3. Project Design Features

In addition to the water conservation features set forth in Project Design Feature L.1-2, the MMP also includes the following project design features with respect to wastewater:

Project Design Feature L.2-1: Prior to the development of a new building, the capacity of the on-site sanitary sewers that would serve the building shall be evaluated based on applicable Bureau of Sanitation and California Plumbing Code standards and replacement or new sanitary sewers shall be installed on-site as necessary to accommodate proposed flows.

Project Design Feature L.2-2: New Project sanitary sewers that may be necessary shall be designed and constructed to conform to the applicable Bureau of Sanitation and California Plumbing Code standards.

Project Design Feature L.2-3: If it is determined, as part of the evaluation performed pursuant to Project Design Feature L.2-1, that existing on-site laterals cannot be utilized for future service for new Project development, the Applicant shall be responsible for the construction of all new service connections to off-site City sanitary sewers. New Project service connections and laterals shall be designed and constructed in accordance with Bureau of Sanitation and California Plumbing Code standards.

4. **Cumulative Impacts**

Forecasted growth from known related projects in areas that are tributary to the City sewers serving the Project Site would generate approximately 0.191 million gallons per day of wastewater under average conditions and 0.565 million gallons per day under peak flows. Combined with the proposed Project's 0.226-million-gallon-per-day average flow and 0.660-million-gallon-per-day peak flow, this equates to a cumulative increase in average daily wastewater flow of 0.417 million gallons per day and a cumulative increase in peak daily wastewater flow of 1.225 million gallons per day. Combined with the proposed Project's 0.226-million-gallon-per-day average flow and the interim projects' 7,500-gallon- per-day average flow, this equates to a cumulative increase in average daily wastewater flow of 0.425 million gallons per day.

There is capacity within the main sewer lines serving the Project to accommodate the cumulative flows. New development projects occurring in the proposed Project vicinity would be subject to LAMC Sections 64.11 and 64.12, which require approval of a sewer permit prior to connection to the sewer system. Additionally, in order to connect to the sewer system, related projects in the City of Los Angeles would be subject to payment of the City's Sewerage Facilities Charge. Payment of such fees would help to offset the costs associated with infrastructure improvements that would be needed to accommodate wastewater generated by overall future growth. Furthermore, similar to the proposed Project, each related project would be required to comply with water conservation programs of the local jurisdictions and the state. Therefore, cumulative impacts on wastewater conveyance systems would be less than significant.

Without accounting for the proposed Project's water conservation features, the proposed Project, interim projects, and related projects would generate a net increase in average daily wastewater flows of approximately 0.425 million gallons per day. The forecasted 2038 average dry weather flow for the Hyperion Service Area is approximately 450 million gallons per day. Based the Hyperion Service Area's assumed future capacity of approximately 550 million gallons per day, the Hyperion Service Area is expected to have adequate capacity to accommodate the cumulative

wastewater flow of approximately 450.4 million gallons per day from the proposed Project, interim projects, related projects, and forecasted growth by 2038. Therefore, cumulative impacts on the wastewater treatment systems would be less than significant.

R. Utilities and Service Systems—Solid Waste (Construction)

1. Construction

Based on construction and debris rates established by the U.S. Environmental Protection Agency, it is anticipated that construction of the proposed Project would generate a total of approximately 84,305 tons of demolition debris and 8,114 tons of construction debris, for a combined total of 92,419 tons of construction-related waste generation. With the proposed diversion of at least 50 percent of the non-hazardous construction and demolition waste based on Project Design Feature L.3-1, the proposed Project would dispose of approximately 46,209 tons of construction and demolition waste at the unclassified landfill throughout the construction timeframe for the proposed Project. This amount of construction and debris waste would represent approximately 0.07 percent of the remaining disposal capacity of 64.21 million tons for the unclassified landfill in Los Angeles County that has solid waste facility permits. Thus, the total amount of construction and demolition waste generated by the proposed Project would represent a fraction of the remaining capacity at the unclassified landfill in Los Angeles County. In addition, the daily construction and demolition waste generated by the proposed Project would also represent a fraction of the existing daily capacity at the unclassified landfill. Since the County's unclassified landfill generally does not face capacity shortages, and the County's unclassified landfill would be able to accommodate Project-generated waste, construction of the proposed Project would not result in the need for an additional disposal facility to adequately handle Project-generated waste. Therefore, construction impacts to solid waste facilities would be less than significant.

2. Project Design Features

Project Design Feature L.3-1: During new construction, a minimum of 50 percent of the non-hazardous demolition and construction debris by weight from construction of new Project buildings shall be recycled and/or salvaged for reuse in compliance with the requirements of City of Los Angeles Department of Building and Safety.

3. Cumulative Impacts

It is anticipated that future cumulative development would implement measures similar to Project Design Feature L.3-1 to divert construction and demolition waste from landfill disposal. Furthermore, the unclassified landfill does not face capacity issues and would be expected to have sufficient capacity to accommodate cumulative demand. Therefore, cumulative impacts on the unclassified landfill would be less than significant and no mitigation measures are required.

S. Utilities and Service Systems—Energy

1. Construction

During proposed Project construction, electricity would be consumed to convey water used for dust control and, on a limited basis, power lights, electronic equipment, and other construction

activities necessitating electrical power. Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Proposed Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities). Overall, a total of 200 megawatt-hours (MWh) of electricity, 315,200 gallons of gasoline, and 1,594,200 gallons of diesel fuel is estimated to be consumed during proposed Project construction. The proposed Project would include measures to avoid unnecessary and wasteful consumption of energy (e.g., powering off equipment when not in use, recycling construction and demolition material). Further, construction of the proposed Project would not result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities. Therefore, energy impacts during construction would be less than significant.

2. **Operations**

During operation of the proposed Project, energy would be consumed for multiple purposes including, but not limited to: heating/ventilating/air conditioning (HVAC), refrigeration, lighting, and the use of electronics, equipment, and machinery. Energy would also be consumed during proposed Project operations related to water usage, solid waste disposal, and vehicle trips. The proposed Project's net new energy demand would be approximately 35,800 MWh of electricity per year, 810,600 cubic feet of natural gas per month, 872,000 gallons of gasoline per year, and 151,500 gallons of diesel fuel per year.

It is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the proposed Project's electricity demand. LADWP has indicated that additional power to meet Project demand would be supplied to existing on-site substations through existing transmission lines and that the existing distribution facilities in the Project area have the capability to supply the increase in electrical demand generated by the proposed Project. Furthermore, it is anticipated that SoCalGas' existing and planned natural gas supplies would be sufficient to support the proposed Project's net increase in demand for natural gas. In addition, SoCalGas has indicated it has the gas supply to accommodate the proposed Project. Therefore, operation of the proposed Project would not result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities. Further, the proposed Project would comply with applicable regulatory requirements regarding energy conservation (e.g., California Building Energy Efficiency Standards and CALGreen) and would implement project design features to further reduce energy use. As such, the proposed Project would not cause wasteful, inefficient, and unnecessary consumption of electricity or natural gas during operation. Impacts associated with operational electricity and natural gas consumption would be less than significant.

With regard to transportation energy use, pursuant to Project Design Feature K-1 in the MMP, the proposed Project would include vehicular trip reduction measures as part of a TDM Program. Additionally, bicycle amenities, such as racks and personal lockers, would be expanded at various locations around the Project Site pursuant to the TDM program. The Project Site is also located in a High-Quality Transit Area designated by SCAG, which indicates that the Project Site is an appropriate site for increased density and employment opportunities from a "smart growth," regional planning perspective. As such, the proposed Project's siting would minimize transportation

fuel consumption through the reduction of vehicle miles traveled (VMT). Therefore, the proposed Project would not cause wasteful, inefficient, and unnecessary consumption of petroleum-based fuel during operation. Impacts associated with operational transportation-related energy use would be less than significant.

3. Project Design Features

Project Design Feature L.4-1: The Applicant shall incorporate the following measures into the design of new buildings for the proposed Project:

- Efficient lighting and lighting control systems;
- Light-colored or "cool" roofs;
- Energy-efficient heating and cooling systems, appliances (e.g., Energy Star) and equipment and control systems;
- Light-emitting diodes (LEDs) for on-site street lighting; and
- Education regarding energy efficiency, water conservation, waste diversion, and recycling services to the Applicant's employees.

4. Cumulative Impacts

The proposed Project would account for approximately 0.13 percent of LADWP's projected energy sales for the proposed Project's build-out year. Accordingly, the proposed Project's contribution to cumulative impacts related to electricity consumption would not be cumulatively considerable and, thus, would be less than significant. Furthermore, like the proposed Project, during construction and operation, other future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and state energy standards under Title 24, and incorporate mitigation measures, as necessary.

The proposed Project would account for approximately 0.018 percent of the 2035 forecasted consumption in SoCalGas's planning area. Accordingly, the proposed Project's contribution to cumulative impacts related to natural gas consumption would not be cumulatively considerable and, thus, would be less than significant. Furthermore, future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and state energy standards under Title 24, and incorporate mitigation measures, as necessary.

The proposed Project would account for approximately 0.005 percent of existing transportation-related energy consumption in the State. The proposed Project is within an infill site that is adjacent to existing, approved, and planned infrastructure, urban services, transportation corridors, transit facilities, and major employment centers in furtherance of SB 375 policies. The proposed Project also would introduce new development and job opportunities within a High-Quality Transit Area, which is consistent with numerous policies in the 2012–2035 RTP/SCS related to locating new jobs near transit. These features would serve to reduce VMT and associated transportation fuel consumption. Thus, while there would be an increase in the consumption of petroleum-based fuels, the proposed Project's contribution to cumulative impacts related to transportation energy consumption would not be cumulatively considerable and, thus, would be less than significant.

VII. IMPACTS FOUND NOT TO BE SIGNIFICANT PRIOR TO MITIGATION, WHERE MITIGATION NONETHELESS PROVIDED TO FURTHER REDUCE IMPACTS

The following effects associated with the Project were analyzed in the EIR and found not to be significant prior to mitigation. Nonetheless, mitigation measures have been incorporated to further reduce these effects, as set forth in the MMP.

A. Public Services—Police Protection

1. Description of Effects

a) Construction Impacts

Construction-related traffic on adjacent streets could potentially affect emergency access to and near the Project Site on a temporary basis. However, construction traffic management plans would be implemented pursuant to Project Design Feature K-2 to ensure that adequate and safe access and parking remains available at the Project Site during construction activities. Therefore, with implementation of Project Design Feature K-2, emergency access impacts from construction activities would be less than significant.

Additionally, the potential for theft of construction equipment and building materials, which would be temporarily stored on-site, would be minimized through the implementation of Project Design Feature J.1-1, which includes the use of security fencing, lighting, locked entry, and security patrol of the Project Site. Thus, potential impacts associated with theft during construction activities would be less than significant.

b) Operational Impacts

On-site security and safety measures would be continued as part of future operation of the Project Site to reduce the demand for the Los Angeles Police Department (LAPD) services, pursuant to Project Design Feature J.1-2. The proposed Project would not generate a demand for additional police protection services that would substantially exceed the capability of the Hollywood or Olympic Community Police Stations to serve the Project Site. In addition, emergency access to the Project Site and surrounding uses would be maintained at all times and proposed Project development would not result in a significant impact on access. Therefore, impacts to police protection service would be less than significant. However, in accordance with City policies, Mitigation Measures J.1-1 and J.1-2 are included in the MMP to ensure that specific design features would be implemented that would further reduce potential impacts related to police protection services.

c) Cumulative Impacts

A number of the identified related projects and ambient growth projections fall within the service areas of the Hollywood Community Police Station and Olympic Community Police Station, which serve the Project Site and surrounding area. The cumulative increase in the police service population from the identified related projects and ambient growth projections would result in a cumulative increase in the demand for police protection services from both the Hollywood Community Police Station and Olympic Community Police Station. Similar to the proposed Project, the related projects would be reviewed by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. In addition, each related

project would be required to comply with regulatory requirements related to police protection. Furthermore, Project-related impacts on police protection services would be less than significant with implementation of project design features, which include the provision of on-site security. Therefore, the combined cumulative impacts on police protection associated with the proposed Project, the interim projects, and the related projects would be less than significant.

2. **Project Design Features**

Project Design Feature J.1-1: During Project construction, the Applicant shall implement security measures including security fencing, lighting, locked entry, and security patrols.

Project Design Feature J.1-2: The Applicant shall continue to provide private on-site security throughout the Project Site during Project operation.

3. **Mitigation Measures**

Mitigation Measure J.1-1: Prior to the issuance of a building permit for a building that abuts a public street, the Applicant shall consult with the Los Angeles Police Department Crime Prevention Unit regarding the incorporation of crime prevention features appropriate for the design of the building, including applicable features in the Los Angeles Police Department's Design Out Crime Guidelines.

Mitigation Measure J.1-2: The Applicant shall submit a diagram of the property to the Los Angeles Police Department- West Bureau Commanding Officer on an annual basis unless no new construction has occurred within the previous year. The diagram shall include access routes, and any additional information that might facilitate police response.

4. **Findings**

Although operation of the proposed Project would not result in significant impacts on police services provided by the LAPD, in accordance with City policies, Mitigation Measures J.1-1 and J.1-2 are included in the MMP to ensure that specific design features would be implemented that would further reduce potential impacts related to police protection services.

5. **Rationale for Findings**

Implementation of Project Design Features J.1-1 and J.1-2 and Project Design Feature K-2 set forth in the MMP would ensure that Project-level and cumulative construction-related impacts on police services would be less than significant. During operation, Project-level and cumulative impacts on police protection services would be less than significant. Furthermore, implementation of Mitigation Measures J.1-1 and J.1-2 set forth in the MMP would ensure that the proposed Project is designed in a manner that would further reduce potential impacts on police protection services.

6. **Reference**

For a complete discussion of environmental impacts with respect to police protection, please see Section IV.J.1, Public Services – Police Protection, of the Draft EIR.

B. Public Services—Fire Protection

1. Description of Effects

a) Construction Impacts

Construction-related traffic on adjacent streets could potentially affect emergency access to and near the Project Site on a temporary basis. However, construction traffic management plans would be implemented pursuant to Project Design Feature K-2 to ensure that adequate and safe access and parking remains available at the Project Site during construction activities. Additionally, implementation of the project design features related to hazards and hazardous materials, as well as compliance with all applicable federal, state, and local requirements concerning the use, handling, and storage of hazardous materials (including flammable materials) would effectively reduce the potential for Project construction activities to expose people to the risk of fire or explosion related to hazardous materials. Therefore, with implementation of project design features and compliance with applicable regulations, construction-related impacts to fire protection services would be less than significant.

b) Operational Impacts

(1) Facilities and Equipment

The proposed Project would not include the development of new residential units which would generate a new residential population in the service area of Fire Station No. 52. While the daytime population projected to be generated by the proposed Project would increase the demand for Los Angeles Fire Department (LAFD) fire protection and emergency medical services, the proposed Project would be located within close proximity (0.8 mile) of Fire Station No. 52. In addition, Fire Stations No. 27, No. 82, No. 29, and No. 61 would continue to be available to serve the Project Site in the event of an emergency. The proposed Project would also implement numerous project design features related to fire protection. These project design features would help reduce the proposed Project's demand for fire protection services provided by the LAFD. In addition, potential fire hazards associated with high-rise structures would be reduced through compliance with numerous construction and Fire Code standards affecting structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, building sprinkler systems, etc. Further, based on a preliminary review of the proposed Project's plans, the LAFD did not conclude that the proposed Project would have a significant impact on LAFD services. Therefore, impacts related to the LAFD's capability to provide adequate fire protection services would be less than significant.

(2) Response Distance and Access

Section 57.507.3.3 of the LAMC sets forth the response distance for commercial uses as 1 mile to a fire station with an engine company and 1.5 miles to a fire station with a truck company. Fire Station No. 52 is located 0.8 mile away and is equipped with two engines. Fire Station No. 27, located 1.2 miles away, is the closest fire station to the Project Site that is equipped with a truck. Therefore, the proposed Project would fall within the LAFD's maximum prescribed response distances, and impacts with regard to fire response distance would be less than significant. Notwithstanding the proposed Project's less than significant impact, Mitigation Measure J.2-1 is included in the MMP to ensure adequate emergency response to the Project Site.

(3) Fire Flow

According to the LAFD, a minimum fire flow ranging from up to 6,000 to up to 9,000 gallons per minute (gpm) from six hydrants flowing simultaneously with a residual pressure of 20 pounds per square inch would be required for the proposed Project. The existing fire protection system on-site is able to deliver a minimum of 5,000 gpm for an unlimited duration of time. Additional on-site fire water lines and hydrants would be constructed as necessary to comply with applicable City requirements regarding fire flows and to provide fire flow service to new buildings. Pursuant to Project Design Feature J.2-4, the proposed fire water system improvements would provide a minimum fire flow of up to 6,000 gpm to up to 9,000 gpm, with a residual pressure of 20 pounds per square inch. With construction of the proposed on-site fire water system improvements, the proposed Project would meet the fire flow requirement. Therefore, the proposed Project would result in a less than significant impact related to fire flows.

c) Cumulative Impacts

Similar to the proposed Project, related projects would be reviewed by the LAFD to ensure that sufficient fire safety and hazards measures are implemented to reduce potential impacts to fire services. In addition, each related project would be required to comply with regulatory requirements related to fire protection and emergency medical services, including fire flow requirements. Furthermore, Project-related impacts on fire protection services would be less than significant with implementation of regulatory requirements and the project design features. Therefore, cumulative impacts associated with the proposed Project, interim projects, and the related projects on the LAFD's capability to provide adequate fire protection services would be less than significant. Each of the related projects identified in the area would be developed within urbanized locations that fall within an acceptable distance from one or more existing fire stations. Therefore, cumulative impacts associated with the proposed Project, interim projects, and the related projects on response distances would be less than significant. In addition, through the City of Los Angeles' routine construction permitting process and coordination with the Los Angeles Department of Water and Power (LADWP), cumulative impacts associated with the proposed Project, interim projects, and the related projects on fire flow water infrastructure would be less than significant.

2. **Project Design Features**

Project Design Feature J.2-1: The Applicant shall submit a plot plan for approval of access and fire hydrants by the Los Angeles Fire Department prior to the issuance of a building permit by the City. The plot plan may include the following design features, as determined by the LAFD:

- No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.
- Access for Los Angeles Fire Department apparatus and personnel to and into all structures shall be required.
- The width of private roadways for general access use and fire lanes shall not be less than 20 feet clear to the sky.
- Fire lanes, where required, and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street

or fire lane shall be greater than 700 feet in length or secondary access would be required.

- All access roads, including fire lanes, shall be maintained in an unobstructed manner, and removal of obstructions shall be at the owner's expense. The entrance to all required fire lanes or required private driveways shall be posted with a sign no less than three square feet in area.
- Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Los Angeles Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.
- Private roadways for general access use shall have a minimum width of 20 feet.
- Where access for a given development requires accommodation of Los Angeles Fire Department apparatus, overhead clearance shall not be less than 14 feet.
- All structures shall be fully sprinklered.
- Adequate public and private fire hydrants shall be required.
- The Los Angeles Fire Department may require additional vehicular access where buildings exceed 28 feet in height.
- Where fire apparatus shall be driven onto the road level surface of the subterranean parking structure, that structure shall be engineered to withstand a bearing pressure of 8,600 pounds per square foot.
- No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance shall be computed along path of travel.
- Any required fire hydrants to be installed shall be fully operational and accepted by the Los Angeles Fire Department prior to any building construction.
- No framing shall be allowed until the roadway is installed to the satisfaction of the Los Angeles Fire Department.
- Private streets shall be recorded as Private Streets and Fire Lanes. All private street plans shall show the words "Private Street and Fire Lane" within the private street easement.
- All parking restrictions for fire lanes shall be posted and/or painted prior to any Temporary Certificate of Occupancy being issued.
- Plans showing areas to be posted and/or painted "FIRE LANE NO PARKING" shall be submitted and approved by the Los Angeles Fire Department prior to building permit application sign-off.
- Electric gates approved by the Los Angeles Fire Department shall be tested by the Los Angeles Fire Department prior to the Los Angeles Department of Building and Safety granting a Certificate of Occupancy.

- Any required Fire Annunciator Panel or Fire Control Room shall be located within 50 feet of the visual line of sight of the main entrance stairwell or to the satisfaction of the Los Angeles Fire Department.

Project Design Feature J.2-2: The Applicant shall continue to provide on-site safety and fire prevention equipment for internal use by trained staff.

Project Design Feature J.2-3: The Applicant shall continue to coordinate with and provide advance notice to the Los Angeles Fire Department regarding large special events (i.e., 2,500 attendees or more) taking place on the Project Site.

Project Design Feature J.2-4: The proposed Project shall comply with the fire flow requirements set forth in Section 57.507.3.1 of the Los Angeles Municipal Code. In doing so, the proposed Project shall provide a minimum fire flow ranging from up to 6,000 to up to 9,000 gallons per minute from six hydrants flowing simultaneously with a residual pressure of 20 pounds per square inch, as determined by the Los Angeles Fire Department based on its review of the proposed Project's design plans.

3. Mitigation Measures

Mitigation Measure J.2-1: The Applicant shall submit an emergency response plan for approval by the Los Angeles Fire Department on an annual basis unless no new construction has occurred within the previous year. The emergency response plan shall include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, and the location of the nearest hospitals and fire departments.

4. Findings

Although operation of the proposed Project would not result in significant impacts on fire services provided by the LAFD, in addition to the project design features above and compliance with applicable state and City regulations, Mitigation Measure J.2-1 is included in the MMP to ensure adequate emergency response to the Project Site.

5. Rationale for Findings

Implementation of Project Design Feature K-2 as set forth in the MMP would ensure that construction-related impacts on fire protection services would be less than significant. During operation, Project-level and cumulative impacts on fire protection services would be less than significant. Furthermore, implementation of Mitigation Measure J.2-1 as set forth in the MMP would ensure that the proposed Project is designed in a manner that would further reduce potential impacts on fire protection services.

6. Reference

For a complete discussion of environmental impacts with respect to fire protection, please see Section IV.J.2, Public Services – Fire Protection, of the Draft EIR.

VIII. IMPACTS FOUND TO BE LESS THAN SIGNIFICANT AFTER MITIGATION

The following impact areas were concluded by the EIR to be less than significant with the implementation of mitigation measures described in the EIR and included in the MMP. Based on that analysis and other evidence in the administrative record relating to the project, the City finds and determines that mitigation measures described in the Final EIR and included in the MMP will reduce potentially significant impacts identified for the following environmental impact categories to below the level of significance:

A. Cultural Resources (Historic Resources)

1. Description of Effects

a) Potential Impacts to Paramount Pictures Historic District

With respect to demolition, with implementation of the Historic Resources Preservation Plan and the other mitigation measures set forth in the MMP, the potential Paramount Pictures Historic District would retain eligibility for historic designation. According to National Park Service guidelines, for a district to retain integrity as a whole, the majority of the components that make up the district's historic character must possess integrity even if they are individually undistinguished. In addition, the relationships among the district's components must be substantially unchanged since the period of significance. With implementation of Mitigation Measures C-1 through C-7 set forth in the MMP, including the Preservation Plan, the overall integrity of the potential Paramount Pictures Historic District would be retained following Project implementation, and the individual components would collectively convey the historic significance of the historic motion picture studio lot. The district would retain significant aspects of integrity, and the complex as a whole would appear largely as it did historically. The central historic core, including some of the earliest remaining stages in Hollywood, important circulation patterns, a hierarchy of uses, and historic spatial relationships, would be retained. As such, the potential Paramount Pictures Historic District would continue to represent a rare remaining physical example of the Major Studio Era in Hollywood. Accordingly, the potential Paramount Pictures Historic District would remain eligible for listing in the National Register under Criterion A, the California Register under Criterion 1, and as a local Historic Cultural-Monument under Criterion 1 following implementation of the proposed Project. In addition, the *City of Los Angeles CEQA Thresholds Guide* criteria relative to historic impacts also would be met because the proposed Project would not result in the demolition of a significant resource, relocation activities that do not maintain the integrity and significance of a significant resource would not occur, or the introduction of new construction on the Main Lot would not reduce the integrity or significance of the potential historic district. Therefore, with implementation of the mitigation measures set forth in the MMP, including the Preservation Plan, potential impacts associated with the demolition of buildings within the potential Paramount Pictures Historic District would be less than significant.

Regarding new construction, the Conceptual Site Plan carefully considers proposed locations for potential new building sites. There is no new construction proposed for the historic administrative core, and existing open space and primary circulation patterns would be maintained and enhanced. The potential building sites would primarily be located adjacent to existing recent construction on the Main Lot or on the peripheral edges of the potential Paramount Pictures Historic District. Based on the Conceptual Site Plan, new construction would meet the National Park Service guidelines for evaluating the integrity of historic districts, as well as the *City of Los Angeles CEQA Thresholds Guide* related to new construction, as the introduction of new construction on the Main Lot would not reduce the integrity or significance of the potential historic district. Therefore, based

on the proposed locations of the building sites, as identified in the Conceptual Site Plan, and implementation of the Historic Resources Preservation Plan and other mitigation measures set forth in the MMP, new construction within the potential Paramount Pictures Historic District would have a less than significant impact.

All proposed rehabilitation or preservation would comply with the Historic Resources Preservation Plan and other mitigation measures set forth in the MMP, which include oversight by a qualified preservation professional. Therefore, with implementation of the Historic Resources Preservation Plan and other mitigation measures set forth in the MMP, the integrity of the remaining contributors would not be diminished, and a less than significant impact would result from any rehabilitation and preservation activities within the potential Paramount Pictures Historic District.

b) Potential Impacts to RKO Studios Historic District

With respect to demolition, with implementation of the Historic Resources Preservation Plan and other mitigation measures set forth in the MMP, the overall integrity of the potential RKO Studios Historic District would be retained following Project implementation, and the individual components would collectively convey the historic significance of the historic motion picture and television studio lot. The district would retain significant aspects of integrity, and the complex as a whole would appear largely as it did historically. The central historic core, including the earliest stages in the district, important circulation patterns, the hierarchy of uses, and historic spatial relationships, would be retained. As such, the potential RKO Studios Historic District would continue to represent a rare remaining physical example of the Major Studio Era in Hollywood and would continue to convey its historic association with the development of the entertainment industry in Los Angeles. Accordingly, the potential RKO Studios Historic District would remain eligible for listing in the National Register under Criterion A, the California Register under Criterion 1, and as a local Historic Cultural-Monument under Criterion 1 following implementation of the proposed Project. In addition, the *City of Los Angeles CEQA Thresholds Guide* criteria relative to historic impacts also would be met because the proposed Project would not result in the demolition of a significant resource, relocation activities that do not maintain the integrity and significance of a significant resource would not occur, or the introduction of new construction on the Main Lot would not reduce the integrity or significance of the potential historic district. Therefore, with the implementation of the mitigation measures set forth in the MMP, including the Preservation Plan, potential impacts associated with the demolition of buildings within the potential RKO Studios Historic District would be less than significant.

With regard to new construction, the Conceptual Site Plan carefully considers proposed locations for potential new building sites. There is no new construction proposed for the historic administrative core, and existing open space and primary circulation patterns would be maintained and enhanced. All new construction proposed within the potential RKO Studios Historic District would be concentrated in the southwest corner and at the eastern edge of the district boundary. These building sites would have adequate separation between proposed new construction and the potential historic district. Based on the Conceptual Site Plan, new construction would meet the National Park Service guidelines for evaluating the integrity of historic districts, as well as the *City of Los Angeles CEQA Thresholds Guide* related to new construction, as the introduction of new construction on the Main Lot would not reduce the integrity or significance of the potential historic district. Therefore, based on the proposed locations of the building sites, as identified in the Conceptual Site Plan, and implementation of the Historic Resources Preservation Plan and other

mitigation measures set forth in the MMP, new construction within the potential RKO Studios Historic District would have a less than significant impact.

All proposed rehabilitation or preservation would comply with the Preservation Plan, would be subject to oversight by a qualified preservation professional, and would conform to the proposed mitigation measures set forth in the MMP. Therefore, with implementation of the Historic Resources Preservation Plan and other mitigation measures set forth in the MMP, the integrity of the remaining contributors would not be diminished and a less than significant impact would result from any rehabilitation and preservation activities within the potential RKO Studios Historic District.

c) Potential Impacts to Historic Resources Located Outside of Historic District Boundaries

The KCAL Building is the only potential historic resource located on the Project Site outside of the boundaries of the potential historic districts. The KCAL Building appears eligible for listing in the National Register of Historic Places under Criterion A and Criterion C, in the California Register of Historical Resources under Criterion 1 and 3, and as a local Historic-Cultural Monument under Criterion 1 and 3. Additionally, the only designated historic resource in the immediate Project vicinity is the Hollywood Forever Cemetery, which was listed in the National Register of Historic Places in 1999.

Following implementation of the proposed Project, the KCAL Building would be retained and rehabilitated according to the Secretary of the Interior's Standards, per the Preservation Plan. The KCAL Building would continue to appear as a stand-alone structure with adequate separation between the historic building and adjacent new construction. Moreover, the new construction would not obscure, damage, or destroy any character-defining features of the KCAL Building, and thus its historic character would not be diminished. With compliance with the Historic Resources Preservation Plan and other mitigation measures set forth in the MMP, new construction associated with the proposed Project would result in a less than significant impact to the KCAL Building.

The proposed Project would not include new construction adjacent to the cemetery within the western portion of the Main Lot (i.e., within the potential RKO Studios Historic District). The Conceptual Site Plan for the proposed Project identifies two potential building sites for new development adjacent to the cemetery within the eastern portion of the Main Lot (i.e., within the potential Paramount Pictures Historic District). Both of the building sites would be separated from the cemetery by existing or new walls or buildings. The cemetery has shared a boundary with the motion picture studios on-site since the 1920s. Based on these factors, new construction would result in a less than significant impact to the Hollywood Forever Cemetery.

d) Potential Impacts to Adjacent Historic Resources

The nearest designated Historic Preservation Overlay Zone (Hancock Park) is located approximately 0.5 mile from the Project Site, and all Historic Preservation Overlay Zones, including Hancock Park, Windsor Square, and Melrose Hill, are separated from the Project Site by major arterial streets and existing development. No neighboring historic resources would be demolished as part of the proposed Project. Therefore, the proposed Project would have a less than significant impact on historic resources in the Project vicinity.

e) Cumulative Impacts

It is not expected that the related projects would impact historic resources of the same character (based on context, building type, evaluation, and designation) as those that are present within the Project Site. In addition, other than Related Project No. 61, due to the distance between the related projects and the Project Site, the related projects are not anticipated to impact the potential historic districts within the Project Site, the KCAL Building, or the Hollywood Forever Cemetery. Related Project No. 61 proposes additional cemetery-related uses within the Hollywood Forever Cemetery, and is subject to independent environmental review under CEQA. Should it be determined that Related Project No. 61 would result in potentially significant impacts to the cemetery's historic designation, it would be required to implement feasible mitigation or alternatives to mitigate those impacts. Furthermore, as a cemetery use, the Hollywood Forever Cemetery does not include historic resources within the same or similar context as those on the Project Site (i.e., entertainment uses). Therefore, cumulative impacts on historic resources would be less than significant.

2. **Project Design Features**

The proposed Specific Plan regulations include a Preservation Plan, as well as specific regulations regarding the preservation of the globe feature at Stage 21.

3. **Mitigation Measures**

Mitigation Measure C-1: Project approval shall include a requirement to implement a preservation plan substantially in the form attached as Appendix L of the *Paramount Pictures Historic Assessment Technical Report* provided in Appendix F of the Draft EIR.

Mitigation Measure C-2: The Applicant shall ensure that archival documentation (Historic American Building Survey [HABS] Level I documentation) will be prepared for district contributors that will be demolished prior to commencement of demolition. HABS Level I documentation shall consist of the following:

- Architectural and historical narrative;
- Adequate archival drawings as available;
- Approximately six (6) to ten (10) large-format photographs documenting each visible façade, context views, and interior views.

Mitigation Measure C-3: No contributing building shall be demolished until the Applicant is ready to proceed with a substitute use, including, for example, a building, landscape, open space, circulation, or production area, for its site.

Mitigation Measure C-4: Production Park and Lucy Park within the Main Lot shall be retained as open space, and future rehabilitation shall conform to the Secretary of the Interior's Standards for the Treatment of Cultural Landscapes and be based on historic photographs and other archival evidence.

Mitigation Measure C-5: Existing avenues within the Main Lot shall be maintained to create a border between existing and new construction. Major historic circulation patterns shall be retained in north-south and east-west orientation.

Mitigation Measure C-6: A qualified preservation professional shall be retained in order to act as the monitor for mitigation measures related to historic resources on the Project Site. The qualified preservation professional shall:

- Verify compliance with the Paramount Pictures Specific Plan Preservation Plan as set forth in the Paramount Pictures Specific Plan; and
- Oversee the Historic American Building Survey documentation required in Mitigation Measure C-2.

Mitigation Measure C-7: The Applicant shall continue to include an interpretive program (e.g., informational signage) on the Main Lot.

4. **Findings**

Changes or alterations have been required in, or incorporated into, the proposed Project that avoid or substantially lessen potential significant environmental effects on Cultural Resources (Historic Resources), as identified in the EIR, to less than significant levels.

5. **Rationale for Findings**

No adverse impacts associated with Cultural Resources (Historic Resources) would occur as a result of the development of the proposed Project with incorporation of Mitigation Measures C-1 through C-7 set forth in the MMP.

6. **Reference**

For a complete discussion of environmental impacts with respect to Cultural Resources (Historic Resources), please see Section IV.C, Cultural Resources, of the Draft EIR and Section II of the Final EIR.

B. Cultural Resources (Archaeological and Paleontological Resources)

1. **Description of Effects**

a) Project Impacts

The results of the records search indicate there are no archaeological sites or isolates, which are artifacts not associated with an archaeological site, located within a 0.5-mile radius of the Project Site or within the Project Site. While this does not preclude the potential for an archaeological site to be identified during construction activities associated with the proposed Project, it is highly unlikely because substantial disturbance of the ground surface has previously occurred on-site. With implementation of Mitigation Measures C-8 and C-9 set forth in the MMP, any potential impacts related to archaeological resources would be reduced to a less than significant level.

The paleontological records search indicates that grading or very shallow excavations in the uppermost layers of soils and Quaternary deposits in the Project Site are unlikely to discover significant vertebrate fossils. However, deeper excavations have the potential to encounter significant remains of fossil vertebrates. With implementation of Mitigation Measure C-10 set forth in the MMP, any potential impacts related to paleontological resources would be reduced to a less than significant level.

b) Cumulative Impacts

With regard to potential cumulative impacts related to archaeological and paleontological resources, the Project vicinity is located within an urbanized area that has been substantially disturbed and developed over time. In the event that archaeological and paleontological resources are uncovered, each related project would be required to comply with applicable regulatory requirements. In addition, as part of the environmental review processes for the related projects, it is expected that mitigation measures would be established as necessary to address the potential for uncovering of paleontological resources and archaeological resources.

2. **Project Design Features**

No project design features are identified in the EIR for this environmental issue.

3. **Mitigation Measures**

Mitigation Measure C-8: If a unique archaeological resource is discovered during Project construction activities, work in the area shall cease and deposits shall be treated in accordance with applicable federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. A unique archaeological resource is defined as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
- Is directly associated with a scientifically recognized important prehistoric or historic event or person [Public Resources Code Section 21083.2(g)].

In addition, if it is determined that an archaeological site is a historical resource, the provisions of Section 21084.1 of the Public Resources Code and CEQA Guidelines Section 15064.5 shall be implemented. A historical resource is defined as a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources [Public Resources Code Section 21084.1]. In the event an archaeological resource is encountered that the archaeologist determines is potentially a Native American resource, the archaeologist shall retain a Native American representative to help determine the appropriate treatment for the resources.

Mitigation Measure C-9: If human remains are encountered during construction, work in the affected area and the immediate vicinity shall be halted immediately. The construction manager at the Project Site shall be notified, and shall notify the archaeologist and Native American monitor, if they are not on-site at the time, as well as the responsible lead agency of the discovery, who in turn shall notify the Native American Heritage Commission and the County Coroner pursuant to procedures and requirements set forth in California Health and Safety Code Section 7050.5. Disposition of the human remains and any associated grave goods shall also be in accordance with this regulation and Public Resources Code 5097.91 and 5097.98, as amended.

The archaeologist and the Native American monitor, with the concurrence of the City, shall determine the area of potential impact and the timing when construction activities can resume.

Mitigation Measure C-10: If any paleontological materials are encountered during ground-disturbing activities for construction of the proposed Project, all further ground-disturbing activities in the area shall be temporarily diverted and the services of a qualified paleontologist shall then be secured. The paleontologist shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The paleontologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource, as appropriate. The Applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report, and a copy of the paleontological survey, study or report shall be submitted to the Los Angeles County Natural History Museum. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist.

4. **Findings**

Changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen potential significant environmental effects on Cultural Resources (Archaeological and Paleontological Resources), as identified in the EIR, to less than significant levels.

5. **Rationale for Findings**

No adverse impacts associated with Cultural Resources (Archaeological and Paleontological Resources) would occur as a result of the development of the Project with incorporation of Mitigation Measures C-8, C-9, and C-10 set forth in the MMP.

6. **Reference**

For a complete discussion of environmental impacts with respect to Cultural Resources (Archaeological and Paleontological Resources), please see Section IV.C, Cultural Resources, of the Draft EIR.

C. Geology and Soils

1. **Description of Effects**

a) Geologic Hazards

(1) Seismic Hazards

No known active or potentially active faults underlie the Project Site. In addition, the Project Site is not located within an Alquist–Priolo Earthquake Fault Zone. Based on these considerations, the risk of fault rupture at the Project Site is considered negligible. Impacts related to fault rupture would be less than significant and no mitigation measures are required.

As with any new development in the State of California, building design and construction for the proposed Project would be required to conform to the current seismic design provisions of the California Building Code. With implementation of Mitigation Measure D-1 set forth in the MMP, which enforces this requirement, the proposed Project would not cause nor accelerate geologic hazards related to strong seismic ground shaking which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury, and impacts associated with strong seismic ground shaking would be less than significant.

The potential for liquefaction, excessive differential settlement, or seismically induced landslides occurring at the Project Site is considered remote. Therefore, the proposed Project would not cause or accelerate geologic hazards related to liquefaction, settlement, or landslides which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. Impacts related to liquefaction, settlement, and landslides would be less than significant and no mitigation measures are required.

Given the distance of the Hollywood Reservoir to the Project Site, the oversight by the Division of Safety of Dams, including regular inspections, and the City's emergency response program, the risk of inundation by a seiche or dam failure at the Project Site is low. Therefore, the proposed Project would not cause or accelerate geologic hazards related to seismically induced seiches, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. Impacts related to seiches would be less than significant and no mitigation measures are required.

(2) Soil Stability

It is anticipated that on-site fill includes non-engineered fill materials. Non-engineered fills are not suitable for support of new fills, foundations, concrete slabs, or paving. With implementation of Mitigation Measure D-2 set forth in the MMP, the proposed Project would not cause or accelerate geologic hazards related to unstable soils, which would result in substantial damage to structures or infrastructure, nor expose people to substantial risk of injury, and impacts associated with expansive soils would be less than significant.

(3) Expansive and Corrosive Soils

The earth materials underlying the Project Site have yielded test results from the very low to the very high expansion potential ranges. The test data indicate that the majority of the testing falls in the moderate expansion potential range. The majority of reported testing indicates that soils within the Project Site are classified as corrosive to ferrous metals. With implementation of Mitigation Measure D-3 set forth in the MMP, the proposed Project would not cause or accelerate geologic hazards related to corrosive soils, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury, and impacts associated with corrosive soils would be less than significant.

(4) Subsurface Oil and Gas

One abandoned oil well may exist in the northeast corner of the Project Site. With implementation of Mitigation Measure E-2 set forth in the MMP, the proposed Project would not

cause or accelerate geologic hazards related to subsurface oil, which would result in substantial damage to structures or infrastructure, nor expose people to substantial risk of injury, and impacts associated with oil would be less than significant. In addition, portions of the Project Site are located within a City-designated Methane Buffer Zone. With implementation of Mitigation Measure D-4 set forth in the MMP, the proposed Project would not cause nor accelerate geologic hazards related to subsurface methane, which would result in substantial damage to structures or infrastructure, nor expose people to substantial risk of injury, and impacts associated with methane would be less than significant.

(5) Subsidence

Any potential settlement related to long-term dewatering for building operation would be less than, and already accounted for in, the construction dewatering settlement. Therefore, the proposed Project would not cause nor accelerate geologic hazards related to subsidence, which would result in substantial damage to structures or infrastructure, nor expose people to substantial risk of injury. Impacts related to subsidence would be less than significant and no mitigation measures are required.

b) Sedimentation and Erosion

Sedimentation and erosion could potentially occur from exposed soils during Project construction. With preparation and implementation of a SWPPP and compliance with applicable City grading regulations, Project construction would not constitute a geologic hazard to other properties by causing or accelerating instability from erosion, nor accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site, and impacts related to sedimentation and erosion would be less than significant during construction.

c) Landform Alteration

The proposed Project would not destroy, permanently cover, or materially and adversely modify any distinct and prominent geologic or topographic features. No impacts associated with landform alteration would occur, and no mitigation measures are required.

d) Cumulative Impacts

Due to the site-specific nature of geological conditions (i.e., soils, geological features, subsurface features, seismic features, etc.), geology impacts are typically assessed on a project-by-project basis rather than on a cumulative basis. Nonetheless, cumulative growth in the Project area through 2038, which includes specific known development projects as well as general ambient growth projected to occur (as described in Section III, Environmental Setting, of the Draft EIR) would expose a greater number of people to seismic hazards. However, as with the proposed Project, interim projects, related projects, and other future development projects would be subject to established guidelines and regulations pertaining to building design and seismic safety, including those set forth in the California Building Code and the Los Angeles Building Code. With adherence to such regulations, cumulative impacts with regard to geology and soils would be less than significant.

2. **Project Design Features**

No project design features are identified in the EIR for this environmental issue.

3. **Mitigation Measures**

Mitigation Measure D-1: A final site-specific, design-level geotechnical, geologic, and seismic hazard investigation report that complies with all applicable state and local code requirements shall be prepared by a qualified geotechnical engineer and certified engineering geologist and submitted to the Los Angeles Department of Building and Safety for each individual building project, consistent with City of Los Angeles requirements (see 2008 Los Angeles Building Code Section 1802.1). The site-specific, design-level geotechnical reports shall address each of the potential geologic hazards addressed in the *Geotechnical Engineering Evaluation for the Paramount Pictures Master Plan, 5555 Melrose Avenue, Los Angeles, California, 90038* prepared by Geotechnologies, Inc., April 2015. The site-specific, design-level geotechnical reports shall include recommendations for each specific building location and building design, including recommendations pertaining to site preparation, fills and compaction, and foundations, and shall include the applicable recommendations set forth in Mitigation Measures D-2 through D-4, below. Additionally, all such recommendations shall comply with applicable provisions and standards set forth in or established by:

(a) California Geological Survey's "Guidelines for Evaluating and Mitigating Seismic Hazards in California, Special Publication No. 117" (Special Publication 117);

(b) The version of the Uniform Building Code, as adopted and amended by the City of Los Angeles, in effect at the time of approval of each site-specific, design-level geotechnical report;

(c) Relevant State, County, and City laws, ordinances, and Code requirements; and

(d) Current standards of practice designed to minimize potential geologic, geotechnical, and related impacts.

The site-specific, design-level geotechnical reports shall be reviewed and approved by the City of Los Angeles Department of Building and Safety.

Mitigation Measure D-2: During construction, encountered non-engineered fills shall be excavated and replaced as compacted fill properly bunched into suitable materials in accordance with City of Los Angeles requirements, or removed. The suitability of the excavated material for reuse in the compacted fills shall be confirmed during each final site-specific, design-level geotechnical investigation in accordance with the applicable provisions and standards detailed in Mitigation Measure D-1.

Mitigation Measure D-3: As part of the site-specific geotechnical report provided for in Mitigation Measure D-1, corrosion testing of Project Site soils, including pH levels, resistivity, sulfate content, chloride content, and other major anions and cations, shall be performed to the extent necessary. Where the evaluation indicates corrosive soil, specific types of pipe, insulation, coatings, and cathodic protection shall be selected in accordance with the

applicable provisions and standards detailed in Mitigation Measure D-1 in order to reduce the risk of corrosion damage to underground utilities.

Mitigation Measure D-4: The design and construction of the proposed Project shall comply with the Los Angeles Methane Seepage Regulations (Los Angeles Municipal Code, Chapter IX, Article 1, Division 71), as applicable, including requirements for site testing.

4. **Findings**

Changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen potential significant environmental effects with regard to Geology and Soils, as identified in the EIR, to less than significant levels.

5. **Rationale for Findings**

No adverse impacts associated with Geology and Soils would occur as a result of the development of the Project with incorporation of Mitigation Measures D-1 through D-4 set forth in the MMP.

6. **Reference**

For a complete discussion of environmental impacts with respect to Geology and Soils, please see Section IV.D, Geology and Soils, of the Draft EIR.

D. Hazards and Hazardous Materials

1. **Description of Effects**

a) Construction Impacts

Compliance with the project design features as well as all applicable federal, state, and local requirements concerning the use, handling, and storage of hazardous materials would effectively reduce the potential for Project construction activities to expose people to a substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Therefore, impacts related to the use, storage, and management of hazardous materials during construction would be less than significant.

With compliance with relevant regulations and requirements, as well as continued implementation of the comprehensive policies and programs specifically related to hazardous waste management on the Project Site, Project construction activities would not expose people to a substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Therefore, impacts associated with hazardous waste management during construction would be less than significant.

Hazardous substances have been and continue to be used on portions of the Project Site and within the surrounding vicinity. The activities conducted in the past at the Project Site may have resulted in the release of hazardous substances, potentially affecting the subsurface at the Project Site. There is the potential to encounter residual contamination in the subsurface during

construction at the Project Site, which would be a potentially significant impact without mitigation. With implementation of Mitigation Measure E-1 set forth in the MMP, impacts related to the potential to encounter residual contamination in the subsurface during construction at the Project Site would be less than significant. In addition, Project-related grading could uncover or disturb existing known and unknown underground storage tanks that could lead to soil and/or groundwater impacts and the potential exposure of people and the environment to hazardous materials, which would be a potentially significant impact without mitigation. With implementation of Mitigation Measure E-1 set forth in the MMP, impacts related to the potential disturbance of underground storage tanks during construction would be less than significant.

Asbestos testing was conducted on the Main Lot and the results revealed asbestos and asbestos-containing materials in several buildings and structures. With implementation of Project Design Feature E-1 set forth in the MMP, impacts related to asbestos-containing materials during construction would be less than significant.

Lead-based paint may also be present on-site, particularly in the Main Lot. With implementation of Project Design Feature E-2 set forth in the MMP, impacts related to lead-based paint during construction would be less than significant.

Based on California State Division of Oil, Gas and Geothermal Resources maps, one abandoned oil well may exist in the northeast corner of the Main Lot. With implementation of Mitigation Measure E-2 set forth in the MMP, impacts related to construction in the area of abandoned oil wells would be less than significant. In addition, based on applicable safety provisions and appropriate monitoring, grading and construction activities associated with development within a Methane Buffer Zone are not expected to substantially expose construction workers to elevated levels of methane or other soil gases. Therefore, impacts associated with construction within a Methane Buffer Zone would be less than significant, and the proposed Project would not expose people or structures to substantial risk resulting from the release of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards.

Construction-related traffic on adjacent streets could potentially affect emergency access to and near the Project Site on a temporary basis. With implementation of Project Design Feature K-2, construction of the proposed Project is not anticipated to significantly impair implementation of or physically interfere with any adopted or on-site emergency response or evacuation plans, and impacts would be less than significant.

b) Operational Impacts

The expansion of operations on the Project Site has the potential to increase the acquisition, use, handling, and storage of hazardous materials on-site. Operation of the proposed Project could increase the opportunity for hazardous materials releases and, subsequently, the exposure of people and the environment to hazardous materials. Project staff on the Project Site would continue to be trained and designated to respond to accidental releases of hazardous materials associated with the acquisition, use, storage, and handling of hazardous materials. In addition, professional hazardous materials response companies would continue to be on-call should a release occur at a time when appropriate staff are not available or the magnitude of the release is such that it cannot be handled internally. With continued implementation of hazardous materials management at the

Project Site, in accordance with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, operation of the proposed Project is expected to be consistent with the goals, policies, and objectives of the City's General Plan Safety Element. Through continued compliance with applicable laws, as well as implementation of the project design features, impacts associated with the use, storage, and management of hazardous materials during operation of the proposed Project would be less than significant.

With implementation of the proposed Project, it is anticipated that hazardous waste-generating activities could increase. As is currently the Applicant's practice, compliance with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous waste would effectively reduce the potential for operation of the proposed Project to expose people to a substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Therefore, impacts associated with hazardous waste generation, handling, and disposal during operation of the proposed Project would be less than significant.

While additional underground storage tanks are not anticipated as part of the proposed Project, expanded operations on the Project Site could require the installation and operation of additional underground storage tanks to accommodate increased hazardous materials similar to those used in existing operations on-site. An increase in the number of underground storage tanks could potentially increase the potential for accidental releases and subsequent impacts to soil, surface water, and groundwater, as well as the potential for environmental and human exposure to hazardous materials. Any new underground storage tanks installed at the Project Site would be required to be installed in accordance with federal, state, and local laws. Plans for any new underground storage tanks installations and for associated post-construction activities, monitoring, and response, would be submitted to the Los Angeles Fire Department (LAFD) for review and approval. The LAFD would oversee compliance with these construction standards and subsequent post-construction requirements. Therefore, impacts related to underground storage tanks during operation of the proposed Project would be less than significant.

Expanded operations on the Project Site could require the installation and operation of additional aboveground storage tanks for storage of motor oil, vegetable oil, propane, and other substances. This increase in the number of aboveground storage tanks on-site could potentially increase the potential for accidental releases and subsequent impacts to soil and surface water, as well as the potential for environmental and human exposure to hazardous materials. Compliance with applicable laws would minimize impacts to human health and the environment associated with aboveground storage tanks by, for example, ensuring that new tanks include secondary containment, as required. Therefore, impacts related to aboveground storage tanks during operation would be less than significant.

As the permitting process would ensure that new development would comply with the City's Methane Seepage Regulations, impacts associated with development within portions of the Project Site within the Methane Buffer Zone would be less than significant, and the proposed Project would not expose people or structures to substantial risk resulting from the release of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards.

Existing emergency response and evacuation plans would be updated and/or new plans created, as appropriate, to include operation of the proposed Project. Therefore, it is not anticipated that Project operations would significantly impair the implementation of or physically interfere with any adopted or on-site emergency response or evacuation plans or a local, state, or federal agency's emergency evacuation plan. No adverse impacts to emergency response or emergency evacuation plans are anticipated.

c) Cumulative Impacts

While impacts associated with hazards and hazardous materials are typically site-specific and do not cumulatively affect off-site areas, conditions such as contaminated groundwater can affect down-gradient properties. In addition, operation of many of the related projects can reasonably be expected to involve the limited use of potentially hazardous materials typical of those used in residential and commercial developments, including cleaning agents, paints, pesticides, and other materials used for landscaping. However, all future development located within the vicinity of the Project Site would be subject to the same local, regional, state, and federal regulations pertaining to hazards and hazardous materials. It is expected that all potentially hazardous materials would be used, stored, and disposed of in accordance with manufacturers' specifications and handled in compliance with applicable standards and regulations. Any risks associated with these materials would be adequately reduced to a less than significant level through compliance with these standards and regulations. In addition, through the extension of existing programs administered on the Project Site, Project impacts with regard to emergency response or evacuation plans would not be cumulatively considerable. As such, cumulative impacts with regard to hazards and hazardous materials from the combined proposed Project, interim projects, and related projects would be less than significant.

2. **Project Design Features**

Project Design Feature E-1: Prior to the issuance of any demolition permit or permit for remodeling of existing buildings, if applicable, the Applicant would provide a letter to the Department of Building and Safety indicating that the demolition/renovation contract provides for a qualified asbestos abatement contractor/specialist to remove or otherwise abate or manage asbestos during demolition or renovation activities in accordance with the South Coast Air Quality Management District's Rule 1403. The Applicant shall comply with State and federal regulations to test for asbestos prior to issuance of any demolition permit. If asbestos-containing materials are found to be present, it shall be abated in compliance with the South Coast Air Quality Management District's Rule 1403, as well as all other applicable state and federal rules and regulations.

Project Design Feature E-2: Prior to the issuance of any permit for demolition or alteration of an existing structure, if applicable, a lead-based paint survey would be performed in compliance with applicable State and federal regulations. Should lead-based paint materials be identified, the Applicant would provide evidence to the Department of Building and Safety demonstrating that the demolition/renovation contract provides that standard handling and disposal practices would be implemented pursuant to Occupational Safety and Health Act regulations. The Applicant shall comply with State and federal regulations to test for lead-based paint prior to issuance of any demolition permit. Should lead-based paint materials be identified,

standard handling and disposal practices shall be implemented pursuant to Occupational Safety and Health Act regulations.

3. **Mitigation Measures**

Mitigation Measure E-1: If excavation or grading occurs in areas identified in Figure IV.E-1 provided as Attachment 1 of the MMP (areas with potential for residual contamination in subsurface), then construction contracts shall include a provision that a qualified environmental professional shall screen soils in the areas of potential contamination prior to such work based on the nature of the potential contamination, and in the event that potential contamination may be encountered during excavation or grading, the contamination shall be evaluated by a qualified environmental professional using appropriate collection and sampling techniques as determined by the environmental professional based on the nature of the contamination. The nature and extent of contamination shall be determined and the appropriate handling, disposal and/or treatment shall be implemented (i.e., excavated/disposed of, treated in-situ [in-place], or otherwise managed) in accordance with applicable regulatory requirements, such as South Coast Air Quality Management District Rule 1166.

If soil contamination is not suspected, but is observed (i.e., by sight, smell, visual, etc.) during excavation and grading activities, excavation and grading within the area of the observed contamination shall be temporarily halted and redirected around the area until the appropriate evaluation and follow-up measures are implemented by a qualified environmental professional, as described above.

Mitigation Measure E-2: Prior to issuance of grading or building permits for construction in the area of the abandoned oil well that may exist in the northeast corner of the Main Lot, the Applicant shall comply with applicable regulations for California State Division of Oil, Gas and Geothermal Resources site plan review. If any oil wells are encountered during excavation and construction, the Applicant shall comply with all applicable requirements of California State Division of Oil, Gas and Geothermal Resources for the investigation and/or re-abandonment of the well.

4. **Findings**

Changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen potential significant environmental effects with regard to Hazards and Hazardous Materials, as identified in the EIR, to less than significant levels.

5. **Rationale for Findings**

No adverse impacts associated with Hazards and Hazardous Materials would occur as a result of the development of the Project with incorporation of Mitigation Measures E-1 and E-2 set forth in the MMP.

6. **Reference**

For a complete discussion of environmental impacts with respect to Hazards and Hazardous Materials, please see Section IV.E, Hazards and Hazardous Materials, of the Draft EIR.

E. Air Quality (Localized Construction and Localized Operations)

1. Description of Effects

a) Construction

(1) Localized Impacts from On-Site Construction Activities

Maximum localized construction emissions for off-site sensitive receptors would not exceed the localized screening thresholds for CO and PM_{10}. However, localized NO_X and $PM_{2.5}$ emissions would exceed the applicable screening-level LST for several construction phases and combined overlapping activities. Therefore, localized construction emissions resulting from the proposed Project would result in a significant short-term impact without mitigation.

b) Operation

(1) Localized Operational Impacts

Operation of the proposed Project would not introduce any major new sources of air pollution within the Project Site. Notwithstanding, the screening level analysis shows that on-site operational emissions would not exceed the CO and NO_X localized significance thresholds, but would exceed the localized PM_{10} and $PM_{2.5}$ significance thresholds. Therefore, the localized effects from the on-site operational emissions of PM_{10} and $PM_{2.5}$ were analyzed using the AERMOD dispersion model. Based on the detail dispersion modeling, on-site operational emissions would not exceed any of the SCAQMD localized significance thresholds.

An analysis of localized operational on-site emissions of existing conditions without the proposed Project versus with the proposed Project was also conducted. The net overall operational on-site emissions associated with the proposed Project would be greater in comparison to Project build-out emissions due to emission factors that assume air quality improves over time based 0on regulations applicable to newer vehicles. As with the Project build-out analysis year, the screening level analysis shows that on-site operational emissions would not exceed the CO and NO_X localized significance thresholds, but would exceed the localized PM_{10} and $PM_{2.5}$ significance thresholds. Therefore, the localized effects from the on-site operational emissions of PM_{10} and $PM_{2.5}$ were analyzed using the AERMOD dispersion model. Based on the detailed dispersion modeling, on-site operational emissions would not exceed any of the SCAQMD localized significance thresholds.

The localized CO hotspot screening analysis conducted for 15 intersections demonstrated that the proposed Project would not cause any new or exacerbate any existing CO hotspots. To further support this conclusion, CO concentration levels were forecasted at the three most potentially impacted intersections based on the highest projected concentration and using peak-hour traffic volumes and conservative meteorological assumptions. Project-generated traffic volumes under buildout in 2038 were forecasted to have a negligible effect on the projected 1-hour and 8-hour CO concentrations at each of the three intersection locations analyzed. Similarly, the Project (2011) analysis also resulted in a negligible effect on the projected 1-hour and 8-hour CO concentrations at the intersections. 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.

c) Cumulative Impacts

(1) Construction

Construction of the proposed Project would have a less than significant cumulative impact due to localized emissions with implementation of mitigation measures.

(2) Operation

An analysis of potential localized operational impacts from on-site activities was conducted. Based on the analysis, localized CO, NO_2, PM_{10}, AND $PM_{2.5}$ operational impacts would not exceed the SCAQMD'S thresholds. As such, the potential localized operational impacts from the proposed Project's on-site activities would not be cumulatively considerable.

2. **Project Design Features**

The following project design features are intended to implement requirements of SCAQMD Rule 403 (Fugitive Dust):

Project Design Feature B.1-1: The owner or contractor shall keep the construction area sufficiently dampened to control dust caused by construction and hauling, and at all times provide reasonable control of dust caused by wind. All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used for haul trucks to reduce dust emissions and meet South Coast Air Quality Management Rule 403.

Project Design Feature B.1-2: All materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amounts of spillage or dust.

Project Design Feature B.1-3: All clearing, earth-moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 25 miles per hour), so as to prevent excessive amounts of dust.

3. **Mitigation Measures**

a. Construction

The following mitigation measures set forth a program of air pollution control strategies designed to reduce the proposed Project's air quality impacts to the extent feasible during construction.

Mitigation Measure B.1-1: The Project representative shall make available to the lead agency and the South Coast Air Quality Management District a comprehensive inventory of all off-road construction equipment, equal to or

greater than 50 horsepower, that will be used an aggregate of 40 or more hours during any portion of construction activities for the proposed Project. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit's certified tier specification, Best Available Control Technology documentation, and California Air Resources Board or Air Quality Management District operating permit shall be available onsite at the time of mobilization of each applicable unit of equipment. Off-road diesel-powered equipment within the construction inventory list described above shall meet the Tier 4 standards where commercially available.

Mitigation Measure B.1-2: All construction equipment shall be properly tuned and maintained in accordance with the manufacturer's specifications.

Mitigation Measure B.1-3: Contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues shall have their engines turned off after five minutes when not in use, to reduce vehicle emissions.

Mitigation Measure B.1-4: Construction activities shall be discontinued during second stage smog alerts.

Mitigation Measure B.1-5: To the extent possible, petroleum-powered construction activity shall utilize electricity from power poles rather than temporary diesel power generators and/or gasoline power generators. If stationary petroleum-powered construction equipment, such as generators, must be operated continuously, such equipment shall be located at least 100 feet from sensitive land uses, whenever possible.

b. Operation

In addition to the project design features designed to reduce greenhouse gas emissions (which would also serve to reduce criteria air pollutants), the following mitigation measures would further reduce operational emissions from the proposed Project:

Mitigation Measure B.1-6: The Applicant or its successor shall minimize delivery truck idling times to a maximum of five minutes, per the California Air Resources Board's Airborne Toxic Control Measure.

Mitigation Measure B.1-7: The Applicant or its successor shall route delivery trucks via the most efficient available route on the Project Site.

4. **Findings**

Changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen potential significant environmental effects with regard to Air Quality (localized construction and operations), as identified in the EIR, to less than significant levels.

5. **Rationale for Findings**

Implementation of the project design features would reduce localized construction, NO_X, $PM_{10,}$ and $PM_{2.5}$ emissions. With incorporation of mitigation measures set forth in the MMP, impacts

from localized NO_X, PM_{10}, and $PM_{2.5}$ emissions would be reduced to a less than significant level. No significant impacts related to local CO concentrations would occur for the proposed Project or cumulatively. Concurrent construction and operational localized emissions would be less than significant for localized NO_X, PM_{10}, and $PM_{2.5}$ impacts. As such, localized emissions that result from concurrent construction and operations would result in a less than significant impact.

6. **Reference**

For a complete discussions of environmental impacts with respect to air quality, please see Section IV.B.1, Air Quality, of the Draft EIR.

IX. SIGNIFICANT IMPACTS WHICH REMAIN SIGNIFICANT AFTER MITIGATION MEASURES

The Project would result in the following impacts, which are found to be significant and unavoidable:

A. Shading

1. **Description of Effects**

a) Project Impacts

Under the proposed Specific Plan, new buildings would be developed in accordance with height zones that establish the maximum building heights for buildings throughout the Project Site. Setbacks would also be established within the proposed Specific Plan. Prior to mitigation, significant impacts are anticipated during the following seasons as a result of shadows cast by future development within the height zones proposed for the Project Site:

- Winter: Camerford Lot (impacts to north); Lemon Grove Lot (Parcels B, C, and D)
- Spring: Lemon Grove Lot (Parcels B, C, and D)
- Summer: Lemon Grove Lot (Parcels B, C, and D)
- Fall: Lemon Grove Lot (Parcels B, C, and D)

Impacts associated with other Project Site locations/seasons and cumulative shading impacts would be less than significant.

b) Cumulative Impacts

Based on the location of the related projects identified in the area, only two projects, Related Project No. 24 and Related Project No. 61, have the potential to cast shadows that may affect some of the same shade-sensitive uses as the proposed Project. Project shadows would extend to residential properties along Camerford Avenue in the morning during spring and fall. However, a cumulative effect resulting from the shading of the same individual properties by the proposed Project and Related Project No. 24 would not be expected. Furthermore, shadows from Related Project No. 61 would not extend beyond the shadow that is already cast by the existing parking

structure on Parcel A of the Lemon Grove Lot during the winter solstice afternoon hours prior to 3:00 P.M. Therefore, it can be assumed that cumulative shading impacts in the vicinity of the Lemon Grove Lot would be less than significant. Cumulative shading impacts would be less than significant.

2. **Project Design Features**

As previously described, future development under the proposed Project would be subject to the proposed Specific Plan, which includes building height limitations based on defined height zones as well as setback requirements. Other than the proposed Specific Plan regulations, no project design features relevant to shading are identified.

3. **Mitigation Measures**

The following mitigation measure is included in the MMP to reduce the significant shadow impacts associated with the proposed Project:

Mitigation Measure A.3-1: A 10-foot setback from the northern property line of the Camerford Lot shall be implemented to reduce shadow impacts affecting shade-sensitive uses to the north.

4. **Findings**

Specific economic, legal, social, technological or other considerations make infeasible additional mitigation measures or project alternatives identified in the EIR.

5. **Rationale for Findings**

With implementation of Mitigation Measure A.3-1 set forth in the MMP, a 10-foot setback would be established from the northern property line of the Camerford Lot. As none of the yards of the residential properties north of the Camerford Lot would be shaded for three or more hours, the potential impact would be eliminated. As for the Lemon Grove Lot, an analysis was performed to determine the extent to which setbacks would need to be increased or building heights reduced in order to eliminate the significant shading impacts resulting from development on the Lemon Grove Lot. It was determined that no feasible mitigation is available to eliminate the significant shading impacts from the Lemon Grove Lot. Because mitigation of the proposed Project's impacts associated with the Lemon Grove Lot would be infeasible, Project-level impacts would be significant and unavoidable. Cumulative shading impacts would be less than significant at the Lemon Grove Lot as no related projects would create shadows that would overlap with new shadows associated with the proposed Project or affect the same shade-sensitive uses as new shadows associated with the proposed Project. However, it is noted that the Project's aesthetic impacts, including shading, would not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099.

6. **Reference**

For a complete discussion of environmental impacts with respect to shading, please see Section IV.A.3, Shading, of the Draft EIR.

B. Air Quality (Construction: Regional Construction and Operational: Regional Operations, Concurrent Construction and Operations)

1. Description of Effects

a) Construction

(1) Regional Construction Impacts

Construction activities would include demolition of existing uses, grading and excavation, and construction of new structures and related infrastructure. It is anticipated that the proposed Project would result in the off-site export of approximately 420,000 cubic yards of excavated soil. Construction-related daily maximum regional construction emissions would not exceed the South Coast Air Quality Management District (SCAQMD) daily significance thresholds for CO, SO_X, PM_{10}, and $PM_{2.5}$. However, maximum regional emissions would exceed the SCAQMD daily significance thresholds for VOC during periods of architectural coatings application and NO_X during periods of heavy construction equipment use. Therefore, regional construction emissions resulting from the proposed Project would result in a significant short-term impact.

b) Operations

(1) Regional Operational Impacts

Regional emissions resulting from operation of the proposed Project are expected to exceed the SCAQMD thresholds for VOC and NO_X. Therefore, air quality impacts from Project operational emissions would be significant without mitigation.

An analysis of daily operational emissions of existing conditions without the proposed Project versus with the proposed Project was also conducted. The net overall operational emissions associated with the proposed Project would be greater in comparison to Project build-out emissions due to emission factors that assume air quality improves over time based on regulations applicable to newer vehicles. As with the Project build-out analysis year, the proposed Project regional emissions analysis would exceed the established SCAQMD threshold levels for VOC and NO_X. The proposed Project would also exceed the SCAQMD regional significance threshold for CO. Therefore, air quality impacts from Project operational emissions would be significant without mitigation.

c) Concurrent Construction and Operational Emissions

Concurrent construction and operational regional emissions of VOC and NOX would exceed the SCAQMD regional thresholds, but would not exceed the SCAQMD localized significance thresholds.

d) Cumulative Impacts

(1) Construction

According to the SCAQMD, individual construction projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable

increase in emissions for those pollutants for which the Air Basin is in non-attainment. Construction-related daily emissions at the Project Site would exceed the SCAQMD's regional significance threshold for NO_X and VOC with mitigation. Consequently, the proposed Project would have a cumulative impact due to construction-related regional VOC and NO_X emissions even with incorporation of mitigation measures.

(2) Operation

According to the SCAQMD, if an individual project results in air emissions of criteria pollutants that exceed the SCAQMD's recommended daily thresholds for project-specific impacts, then the project would also result in a cumulatively considerable net increase of these criteria pollutants. Regional emissions resulting from operation of the proposed Project are expected to exceed the SCAQMD thresholds for VOC and NO_X. Therefore, air quality impacts from Project operational emissions would be significant without mitigation. Thus, the emissions of non-attainment pollutants and precursors generated by Project operation in excess of the SCAQMD project-level thresholds also would be cumulatively considerable.

2. **Project Design Features**

The following project design features are intended to implement requirements of SCAQMD Rule 403 (Fugitive Dust):

Project Design Feature B.1-1: The owner or contractor shall keep the construction area sufficiently dampened to control dust caused by construction and hauling, and at all times provide reasonable control of dust caused by wind. All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used for haul trucks to reduce dust emissions and meet South Coast Air Quality Management District Rule 403.

Project Design Feature B.1-2: All materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amounts of spillage or dust.

Project Design Feature B.1-3: All clearing, earth-moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 25 miles per hour), so as to prevent excessive amounts of dust.

3. **Mitigation Measures**

a) Construction

The following mitigation measures set forth a program of air pollution control strategies designed to reduce the proposed Project's air quality impacts to the extent feasible during construction.

Mitigation Measure B.1-1: The Project representative shall make available to the lead agency and the South Coast Air Quality Management District a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used an aggregate of 40 or more hours during any portion of construction activities for the proposed Project.

The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit's certified tier specification, Best Available Control Technology documentation, and California Air Resources Board or Air Quality Management District operating permit shall be available onsite at the time of mobilization of each applicable unit of equipment. Off-road diesel-powered equipment within the construction inventory list described above shall meet the Tier 4 standards where commercially available.

Mitigation Measure B.1-2: All construction equipment shall be properly tuned and maintained in accordance with the manufacturer's specifications.

Mitigation Measure B.1-3: Contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues shall have their engines turned off after five minutes when not in use, to reduce vehicle emissions.

Mitigation Measure B.1-4: Construction activities shall be discontinued during second-stage smog alerts.

Mitigation Measure B.1-5: To the extent possible, petroleum-powered construction activity shall utilize electricity from power poles rather than temporary diesel power generators and/or gasoline power generators. If stationary petroleum-powered construction equipment, such as generators, must be operated continuously, such equipment shall be located at least 100 feet from sensitive land uses, whenever possible.

b) Operation

In addition to the project design features designed to reduce greenhouse gas emissions (which would also serve to reduce criteria air pollutants), the following mitigation measures would further reduce operational emissions from the proposed Project:

Mitigation Measure B.1-6: The Applicant or its successor shall minimize delivery truck idling times to a maximum of five minutes, per the California Air Resources Board's Airborne Toxic Control Measure.

Mitigation Measure B.1-7: The Applicant or its successor shall route delivery trucks via the most efficient available route on the Project Site.

4. **Findings**

Specific economic, legal, social, technological or other considerations make infeasible additional mitigation measures or project alternatives identified in the EIR.

5. **Rationale for Findings**

Implementation of the mitigation measures and project design features set forth in the MMP would reduce construction emissions for all pollutants. However, even with the incorporation of mitigation measures, the proposed Project would exceed the SCAQMD regional significance thresholds for NO_X and VOC during some periods of construction. As such, Project construction would result in significant and unavoidable Project-level and cumulative regional impacts even with incorporation of all feasible mitigation measures.

Although the proposed Project would incorporate feasible mitigation measures and project design features to reduce operational emissions, regional operational emissions associated with the proposed Project buildout analysis year still would exceed the SCAQMD daily emission threshold for regional NO_X and VOC after implementation of feasible mitigation measures. The net overall operational emissions associated with the proposed Project would exceed the established SCAQMD threshold levels for VOC, NO_X, and CO. Therefore, operation of the proposed Project would have a significant and unavoidable Project-level impact on regional air quality. No additional feasible mitigation has been identified to further reduce these regional impacts. Cumulative operational air quality impacts would also remain significant. Project development would be consistent with the air quality policies set forth in the SCAQMD's AQMP and the City of Los Angeles General Plan Air Quality Element, resulting in a less than significant impact.

Implementation of the mitigation measures and project design features set forth in the MMP would reduce NO_X, PM_{10} and $PM_{2.5}$ emissions. Even with incorporation of mitigation measures, during certain periods of concurrent construction and operation, the proposed Project would remain in exceedance of the SCAQMD regional threshold for VOC and NO_X.

The project design features and mitigation measures set forth in the MMP would reduce pollutant emissions. Concurrent construction and operational regional emissions of VOC and NO_X would exceed SCAQMD regional thresholds. As such, regional emissions that result from concurrent construction and operations would result in a significant impact for regional VOC and NO_X emissions.

6. Reference

For a complete discussion of environmental impacts with respect to air quality, please see Section IV.B.1, Air Quality, of the Draft EIR.

C. Noise (Construction Noise and Vibration)

1. Description of Effects

a) On-Site Construction Noise Sources

Based on noise data collected by the Federal Highway Administration, individual pieces of construction equipment that would be used for construction of the proposed Project produce maximum noise levels (L_{max}) of 74 A-weighted decibels (dBA) to 90 dBA at a reference distance of 50 feet from the noise source. These maximum noise levels would occur when equipment is operating under full power conditions (i.e., the equipment engine at maximum speed). However, equipment used on construction sites often operates under less-than-full power conditions, or part power. To more accurately characterize construction-period noise levels, the average (hourly L_{eq}) noise level associated with each construction stage (i.e., demolition, site grading, building construction, and landscaping) was calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction stage. These noise levels are typically associated with multiple pieces of equipment operating simultaneously.

The Project construction schedule would depend on market conditions and the business needs of the Applicant. For purposes of the construction noise analysis, a construction phasing

schedule was developed that considers the anticipated business needs and the maximum amount of development that may simultaneously occur on the Project Site at any one time. As discussed in Section IV.H, Noise, of the Draft EIR, the analysis assumed the proposed Project would be constructed over four phases (A, B, C and D). Within each phase, construction activities were grouped by geographic area (sub-phase) to allow for maximum construction activities to occur within a phase while providing for continued studio operations within the Project Site. The analysis shows that construction noise levels generated during various phases of the Project construction activities could exceed the 5 dBA above ambient noise level significance threshold at the following off-site sensitive receptors:

- Phase A—Receptors R2, R3, R7, R8, R12, and R16
- Phase B—Receptors R3, R5, R6, R10, R11, R14, R15, and R16
- Phase C—Receptors R2, R3, R11, R12, R14, and R16
- Phase D—Receptors R5, R11, R13, R14, and R16

In addition, based on the construction phasing schedule, the potential exists for overlapping construction between phases. The overlapping construction activities could result in an increase above the estimated highest construction noise level of 2.8 dBA at receptor R4 due to overlapping construction activities for sub-phases C4 and C5. Construction noise levels at the existing on-site childcare centers for all construction phases would be below the significance threshold.

b) Off-Site Construction Noise Sources

In addition to on-site construction noise, delivery/haul trucks (trucks), and construction worker vehicles would require access to the Project Site during various construction phases. Construction-related haul trucks would generate noise levels ranging from 56.3 dBA ($L_{eq(hr)}$) during Phase A to 67.8 dBA ($L_{eq(hr)}$) during Phase D. The estimated construction haul truck noise levels would be below the existing daytime hourly ambient noise levels measured along Lemon Grove Avenue, Melrose Avenue, and Western Avenue. The construction related trucks noise would exceed the existing ambient noise levels by up to 1.9 dBA ($L_{eq(hr)}$) along Van Ness Avenue and up to 2.4 dBA ($L_{eq(hr)}$) along Gower Street, which would be below the 5 dBA above ambient noise level significance threshold. As such, noise impacts associated with off-site construction truck traffic would be less than significant.

c) Construction Vibration

Construction activities can generate varying degrees of ground vibration, depending on the construction procedures and type of equipment used. Vibration velocities from typical heavy construction equipment operations that would be used during construction of the proposed Project would range from 0.003 to 0.089 peak particle velocity (PPV) at a distance of 25 feet from the equipment. The majority of the Project construction activities would occur within the Main Lot and would be a minimum of 50 feet from off-site building structures. Therefore, the estimated vibration velocity levels for construction activities within the Main Lot would be well below the most stringent significance threshold of 0.12 PPV. However, construction activities at the Ancillary Lots could occur in closer proximity to off-site building structures. Vibration levels generated by a large bulldozer or

caisson drilling would be up to 0.995 PPV (at 5 feet from the equipment) and 0.192 PPV (at 15 feet from the equipment). With implementation of Project Design Feature H-2, which requires that the use of large bulldozers and caisson drilling occur a minimum of 15 feet from the nearest off-site building, vibration impacts associated with potential building damage during construction activities would be less than significant.

Potential vibration impacts with respect to human annoyance were also evaluated. The anticipated construction equipment for Project construction would generate vibration levels ranging from 58 VdB (a decibel unit referenced to a velocity of 1 micro-inch per second) for a small bulldozer to up to 87 VdB for a large bulldozer operating at a distance of 25 feet. The vibration level from the large bulldozer would attenuate to below the 72 VdB significance threshold at a distance of 80 feet. Therefore, except for construction activities within 15 feet of Van Ness Avenue, vibration impacts with respect to human annoyance would be less than significant for construction activities within the Main Lot. Vibration levels generated by construction equipment operating at the Ancillary Lots would exceed the 72 VdB significance threshold at the adjacent sensitive receptors within 80 feet of large construction equipment. Impacts would occur on a short-term basis when large construction equipment (e.g., a large bulldozer) would operate within 80 feet from the sensitive receptors.

Based on Federal Transit Administration (FTA) data, the vibration generated by a typical haul truck would be approximately 63 VdB (0.00566 PPV) at a distance of 50 feet from the truck. There are building structures and sensitive receptors (i.e., residential uses) that are located as close as 15 feet from the haul truck routes. Therefore, the vibration level generated by the haul trucks would be approximately 0.034 PPV, which would be well below the most stringent building damage threshold of 0.12 PPV for buildings.

The vibration levels at sensitive receptors within 15 feet of the haul routes would be approximately 79 VdB, which would exceed the 72 VdB significance threshold for human annoyance. Per the FTA, “it is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads.” However, vibration impacts with respect to human annoyance along the haul routes during construction would be significant at sensitive receptors located within 25 feet from the haul route.

d) Cumulative Impacts

While the majority of the related projects are located a substantial distance from the Project Site, based on the location of the related projects identified in the area, there are three related projects near the Project Site, including: Related Project No. 61, which proposes cemetery-related uses within the cemetery immediately north of the Project Site; Related Project No. 24, a condominium and retail development at 5663 Melrose Avenue (approximately 450 feet west of the Project Site); and Related Project No. 9, at 5651 Santa Monica Boulevard (approximately 800 feet from the Project Site, north of the Lemon Grove Lot). However, construction of Related Project No. 24 has recently been completed. The next closest related project is approximately 1,600 feet from the Project Site.

Since the timing of the construction activities for related projects cannot be defined, any quantitative analysis that assumes multiple, concurrent construction projects would be entirely speculative. Nonetheless, if construction of Related Project No. 61 or Related Project No. 9 were to

occur concurrently with the construction on the north or northeast sides of the Project Site, respectively, these related projects could have a contribution to the cumulative impact on nearby noise-sensitive receptors. Specifically, concurrent construction of the proposed Project and Related Project No. 61 could impact noise-sensitive receptors located in proximity to the northern boundary of the Project Site (i.e., elementary school and residential uses along Van Ness Avenue). Concurrent construction of the proposed Project and Related Project No. 9 could impact noise-sensitive receptors located between Related Project No. 9 and the Project Site (i.e., residential uses located along Van Ness Avenue, Ridgewood Place and Wilton Place, south of Santa Monica Boulevard, represented by R1). Construction-related noise levels from the related projects would be intermittent and temporary. Noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures for each individual related project and compliance with locally adopted and enforced noise ordinances. Nonetheless, even with proposed mitigation measures, if nearby Related Project No. 61 and/or Related Project No. 9 were to be constructed concurrently with the proposed Project, significant and unavoidable cumulative construction noise impacts could result.

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., less than 25 feet). Although the Related Project No. 61 site is adjacent to the Project Site, the proposed construction areas of Related Project No. 61 would be a minimum of approximately 90 feet from the Project Site. In addition, Related Project No. 9 is approximately 800 feet away from the Project Site. Therefore, due to the rapid attenuation characteristics of ground-borne vibration, there would be no potential cumulative construction impact with respect to ground-borne vibration.

2. **Project Design Features**

Project Design Feature H-1: Power construction equipment (including combustion engines), fixed or mobile, shall be equipped with noise shielding and muffling devices (consistent with manufactures' standards). All equipment shall be properly maintained.

Project Design Feature H-2: The use of caisson drilling and/or large bulldozers shall occur a minimum of 15 feet from the nearest off-site building.

3. **Mitigation Measures**

Mitigation Measure H-1: Prior to the issuance of grading permits for the development of a new building, structure or infrastructure for the proposed Project, the Applicant or its successor shall provide proof satisfactory to the City Department of Public Works or Department of Building and Safety, as applicable, that all related construction contractors have been required in writing to comply with the City Noise Ordinance, and the contractor or the Applicant or its successor shall design a Construction Noise Mitigation Plan to minimize the construction-related noise impacts to off-site noise-sensitive receptors. The Construction Noise Mitigation Plan may include the following:

- Use temporary sound barriers between the proposed Project construction area and affected noise-sensitive receptors where feasible and necessary;

- Stationary source equipment which is flexible with regard to relocation (e.g., generators and compressors) shall be located so as to maintain the greatest feasible distance from off-site noise-sensitive land uses;
- To the extent feasible, the staging of high noise-generating activities should take place during mid-day and/or when fewer people are at home or ambient noise levels in the receptor areas are at their highest levels;
- To the extent feasible, construction and demolition activities should be scheduled so as to avoid operating several pieces of equipment simultaneously;
- Limit engine idling from construction equipment. Specifically, the idling of haul trucks shall be limited to 5 minutes at any given location as established by the South Coast Air Quality Management District;
- Provide for the location of construction staging areas to be situated and operated in a manner which will limit direct interference with residential streets surrounding the Project Site;
- Provide a hotline to enable the public to call and address construction related issues associated with the construction; and
- Project construction shall not use impact pile driving methods.

4. **Findings**

Specific economic, legal, social, technological or other considerations make infeasible additional mitigation measures or project alternatives identified in the EIR.

5. **Rationale for Findings**

Implementation of the project design features and compliance with the mitigation measures set forth in the MMP would reduce Project and cumulative construction noise and vibration levels to the extent feasible. Implementation of the noise mitigation measures would reduce the construction-related noise of the proposed Project. However, depending on the receptor and ambient noise levels at the time of construction, significant temporary construction noise impacts could exceed the significance threshold. Thus, proposed Project and cumulative noise impacts associated with construction activities would be significant and unavoidable.

As explained further in Section IV.H, Noise, of the Draft EIR, the estimation of potential construction noise levels represent a conservative noise impact scenario in which all construction equipment during each phase of construction was assumed to operate simultaneously and was assumed to be located at the construction area nearest to the potentially affected off-site noise-sensitive receptor. Typically, construction activities would be spread throughout the entire site, further away from the affected receptors. As evaluated, construction noise impacts would be

temporary and variable during construction, and would affect off-site noise-sensitive receptors differently depending on the location of the construction. Given that the potential impact is conservatively estimated and would be variable as to time, duration, and location, off-site noise-reduction measures would not be feasible.

Implementation of Project Design Feature H-2 set forth in the MMP would ensure that vibration generated during construction activities would be reduced to levels below the significance threshold for building damage at the adjacent off-site buildings. In addition, Project Design Feature H-2 would reduce the vibration impacts with respect to human annoyance. However, there are no other feasible mitigation measures that would reduce the vibration levels during certain construction activities to below the significance threshold for human annoyance. Therefore, vibration impacts on human annoyance during construction would be significant and unavoidable. The vibration impacts on human annoyance would be short-term and would only occur when large construction equipment is operated within 80 feet of a sensitive receptor. Ground-borne vibration from each of the construction sites (proposed Project and related projects) would rapidly attenuate from each of the construction sites, which would not result in cumulative construction vibration impacts. Therefore, cumulative construction vibration impacts would be less than significant.

6. Reference

For a complete discussion of environmental impacts with respect to noise, please see Section IV.H, Noise, of the Draft EIR.

D. Traffic, Access, and Parking (Intersection Level of Service, Neighborhood Intrusion, In-Street Construction, Supplemental Caltrans Analysis)

1. Description of Effects

a) Intersection Level of Service

(1) Project Trip Generation

It is estimated that after Project construction, the Project Site (including the existing components that would remain after construction) would generate a total of 21,226 daily trips on a typical weekday, including approximately 2,160 morning peak-hour trips (1,650 inbound, 510 outbound) and 2,288 afternoon peak-hour trips (688 inbound, 1,600 outbound). The existing land uses on the Project Site are estimated to currently generate a total of 11,396 daily trips on a typical weekday, including approximately 1,235 morning peak-hour trips (938 inbound, 297 outbound) and 1,255 afternoon peak-hour trips (391 inbound, 864 outbound). The proposed Project is, therefore, expected to generate a net total of 9,830 daily trips on a typical weekday, including approximately 925 morning peak-hour trips (712 inbound, 213 outbound) and 1,033 afternoon peak-hour trips (297 inbound, 736 outbound).

(2) Existing with Project Intersection Operations (Existing with Project Before Mitigation)

The Existing with Project analysis assumes the proposed Project is constructed to full buildout and added to existing traffic conditions. Of the 65 signalized study intersections, 51 are projected to operate at Level of Service (LOS) D or better during both the morning and afternoon

peak hours under the Existing with Project conditions. The remaining 14 intersections are projected to operate at LOS E or F during one or both peak hours. Under Existing with Project conditions, the proposed Project would result in 11 significant impacts during the morning peak hour and 14 significant impacts during the afternoon peak hour at signalized intersections before implementation of the Project TDM program or mitigation measures discussed below. Because intersections impacted during the morning peak hour can be the same intersections impacted during the afternoon peak hour, a total of 17 of the 65 signalized study intersections are expected to be impacted during either the morning or afternoon peak hours under Existing with Project conditions. The remaining 48 signalized intersections would not be significantly impacted.

Of the 11 unsignalized study intersections, 10 are projected to operate at LOS D or better during the morning peak hour under the Existing with Project conditions. The remaining intersection, US 101 Southbound Off-Ramp & Lexington Avenue (Unsignalized Intersection No. 9), is projected to operate at LOS E during the morning peak hour under both the Existing with Project Before Mitigation and the Existing with Project with Mitigation conditions. The intersection does not meet signal warrants, and thus does not meet the City's criteria for signalization.

Based on the *City of Los Angeles CEQA Thresholds Guide* methodology for analyzing unsignalized intersections, under Existing with Project conditions before mitigation, the proposed Project would cause significant impacts at the following two unsignalized study intersections: (1) Unsignalized Intersection No. 6: Gower Street & US 101 Southbound Off-Ramp/Yucca Street; and (2) Unsignalized Intersection No. 8: Western Avenue & US 101 Northbound On-Ramp.

(3) Future with Project Intersection Operations (Future with Project Before Mitigation)

The Future with Project analysis assumes the proposed Project is constructed to full buildout and added to future traffic conditions, which comprises existing traffic, interim projects, ambient, and related project traffic growth and future roadway and infrastructure improvements, but does not include any of the features or benefits of the proposed Project's TDM program and mitigation measures. Of the 65 signalized study intersections, 41 would operate at LOS D or better during both the morning and afternoon peak hours under Future with Project conditions. The remaining 24 intersections would operate at LOS E or F during at least one analyzed peak hour. Under Future with Project conditions, the proposed Project would result in 13 significant impacts during the morning peak hour and 16 significant impacts during the afternoon peak hour at signalized intersections before implementation of the proposed Project's TDM program or mitigation measures set forth below. As intersections impacted during the morning peak hour can be the same intersections impacted during the afternoon peak hour, a total of 19 of the 65 signalized study intersections are expected to be impacted during either the morning or afternoon peak hours under Future with Project conditions before mitigation. The remaining 46 signalized intersections would not be significantly impacted.

With regard to unsignalized intersections, 3 of the 11 unsignalized intersections would operate at LOS E or F during the morning or afternoon peak hour. The remaining 8 unsignalized intersections would operate at LOS D or better during both peak hours. Of these intersections, the following two intersections would meet Los Angeles Department of Transportation (LADOT) criteria for signalization:

- Gower Street & US 101 SB Off-Ramp/Yucca Street (Unsignalized Intersection No. 6); and

- Normandie Avenue & US 101 NB On-Ramp/Monroe Street (Unsignalized Intersection No. 10).

It should be noted that both of these intersections also meet signal warrants in both the Future without Project conditions before mitigation as well as under Existing conditions, so neither Project traffic nor ambient growth is causing the intersections to meet signal warrants.

Under the *City of Los Angeles CEQA Thresholds Guide* methodology, the proposed Project would cause potential significant impacts at the following three unsignalized study intersections: (1) Unsignalized Intersection No. 6: Gower Street & US 101 Southbound Off-Ramp/Yucca Street; (2) Unsignalized Intersection No. 8: Western Avenue & US 101 Northbound On-Ramp; and (3) Unsignalized Intersection No. 10: Normandie Avenue & US 101 NB On-Ramp/Monroe Street.

b) Neighborhood Intrusion

Five neighborhoods were identified according to LADOT criteria that may be subject to significant neighborhood intrusion impacts (cut-through traffic) by the Project-generated traffic under either Existing with Project or Future with Project conditions before mitigation. These neighborhoods are described as follows:

- De Longpre Avenue to the north, Gower Street to the east, Santa Monica Boulevard to the south, and Vine Street to the west;

- Sunset Boulevard to the north, Bronson Avenue to the east, Fountain Avenue to the south, and Gordon Street to the west;

- Fountain Avenue to the north, Bronson Avenue to the east, Santa Monica Boulevard to the south, and Gower Street to the west;

- Santa Monica Boulevard to the north, Wilton Place to the east, Melrose Avenue to the south, and Van Ness Avenue to the west; and

- Santa Monica Boulevard to the north, Western Avenue to the east, Lemon Grove Avenue to the south, and Wilton Place to the west.

These potential impacts are considered significant, and a Neighborhood Traffic Management Plan process by which the potential impacts can be identified and mitigated has been incorporated into the mitigation for neighborhood intrusion impacts, as discussed below.

c) In-Street Construction

The maximum anticipated construction traffic during any phase of Project construction is expected to generate a maximum of 68 morning peak-hour trips and 108 afternoon peak-hour trips from construction activity. Depending on the haul route utilized, construction traffic could result in

temporary traffic impacts at up to four study intersections. To reduce potential traffic impacts related to construction traffic, construction traffic management plans would be implemented, as discussed below, which would help to minimize the amount and effect of peak hour construction traffic.

Project development along the Project Site perimeter streets, including Van Ness Avenue, Gower Street, Melrose Avenue, Ridgewood Place, Gregory Avenue, and Camerford Avenue, may result in temporary lane closures, temporary sidewalk closures, temporary loss of street parking, and/or temporary bus stop relocation. Therefore, temporary impacts could occur with regard to the loss of on-street parking, sidewalk closure, and relocation of bus stops. Such temporary impacts are considered significant.

d) Supplemental Caltrans Analysis

Caltrans uses different methodologies than the City of Los Angeles to evaluate operating conditions at Caltrans facilities (intersections, freeway mainline segments, and freeway on-ramps and off-ramps). While Caltrans does not have published criteria for determining potential impacts to its facilities, to be conservative, a supplemental analysis of Caltrans facilities according to Caltrans guidelines is presented in Appendix K of the Traffic Study included in Appendix Q of the Draft EIR. As summarized in this supplemental Caltrans analysis additional unsignalized intersections and freeway mainline segments may be impacted by the Project before mitigation. Due to the uncertainties surrounding the potential Caltrans evaluation of impacts to its facilities, to be conservative and for the purposes of the EIR analysis, the potential impacts are considered significant.

e) Cumulative Impacts

(1) Intersections

Implementation of the proposed Project in conjunction with the interim projects and related projects identified in Section III, Environmental Setting, of the Draft EIR and projected regional growth would increase the amount of traffic in the Study Area. As discussed previously, the analysis of Future-with-Project conditions reflects both Project-specific and future cumulative traffic impacts related to intersection LOS, because the Future-with-Project condition considers a combination of existing traffic conditions, plus traffic from regional growth and related projects, and Project traffic. Therefore, the proposed Project's contribution to impacts that would occur under the future cumulative conditions would be considerable, and cumulative impacts would be significant at the intersections discussed above.

(2) Neighborhood Intrusion

Implementation of the proposed Project in conjunction with the related projects would increase the amount of traffic in the Study Area. As discussed previously, the analysis of the Future with Project condition reflects both Project-specific and future cumulative traffic impacts related to traffic volumes and traffic distribution in the Study Area. The proposed Project's impacts related to neighborhood intrusion at the five neighborhoods identified above as having the potential to experience significant neighborhood intrusion impacts could remain significant because at this time it is not known whether a consensus would be reached among residents in the affected neighborhoods on the implementation of mitigation measures or if the agreed upon measure would

reduce impacts to less than significant levels. No other feasible mitigation was identified. Therefore, cumulative impacts related to neighborhood intrusion are conservatively considered significant and unavoidable.

(3) In-Street Construction

Most of the related projects are not located in close proximity to the Project Site and may or may not be developed within the same construction schedule as the proposed Project. In addition, per standard City practice, the construction of large development projects would occur in accordance with project-specific construction traffic management plans, as is the case with the proposed Project. As construction traffic management plans are reviewed and approved by LADOT, it is anticipated that through this process, LADOT would coordinate construction activities among the projects that would have the potential to result in cumulative intersection impacts. Under these circumstances, cumulative impacts at study intersections during construction would be less than significant.

As discussed above, the proposed Project could result in temporary construction impacts associated with the loss of on-street parking, sidewalk closures, and relocation of bus stops. To the extent that nearby related projects (e.g., Related Project No. 61 at the cemetery north of the Project Site) also result in such temporary impacts concurrent with the proposed Project, these impacts would be considered cumulatively significant.

(4) Supplemental Caltrans Analysis

As noted above, Caltrans uses different methodologies than the City of Los Angeles to evaluate operating conditions at Caltrans facilities. While Caltrans does not have published criteria for determining potential impacts to its facilities, to be conservative, a supplemental analysis of Caltrans facilities according to Caltrans guidelines is presented in Appendix K of the Traffic Study included in Appendix Q of the Draft EIR. As summarized in this supplemental Caltrans analysis additional unsignalized intersections and freeway mainline segments may be impacted by the Project before mitigation. Due to the uncertainties surrounding the potential Caltrans evaluation of impacts to its facilities, to be conservative and for the purposes of the EIR analysis, the potential impacts are considered significant.

2. **Project Design Features**

Project Design Feature K-1: The Project Applicant shall prepare and implement a Transportation Demand Management (TDM) program to reduce traffic impacts of the proposed Project. The TDM program shall include implementation of several TDM strategies, which may include, but are not limited to the following:

- Flexible work schedules and telecommuting programs;
- Bicycle amenities (bicycle racks, lockers, etc.);
- Guaranteed Ride Home program;
- Rideshare/carpool/vanpool promotion and support;
- Transportation Information Center;

- On-Site TDM Coordinator;
- Discounted transit passes;
- Mobility hub support;
- Funding for bikeway improvements; and
- Continued provision of on-site personnel at studio entry gates to facilitate traffic flow onto the Project Site.

Project Design Feature K-2: Construction Traffic Management Plan

The Project Applicant shall prepare detailed construction traffic management plans, including street closure information, detour plans, haul routes, and staging plans as necessary and satisfactory to the City. The construction traffic management plans shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include the following elements as appropriate:

- Provisions for temporary traffic control during all construction activities along public rights-of-way to improve traffic flow on public roadways (e.g., flaggers);
- Scheduling construction activities to reduce the effect on traffic flow on arterial streets;
- Construction-related vehicles shall not park on surrounding public streets;
- Provision of safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers;
- Contractors shall be required to participate in a common carpool registry during all periods of contract performance monitored and maintained by the general contractor;
- Schedule construction-related deliveries, other than concrete and earthwork-related deliveries, to reduce travel during peak travel periods as identified in this study;
- Obtain the required permits for truck haul routes from the City of Los Angeles prior to the issuance of any grading permit for the proposed Project; and
- Obtain the required Caltrans transportation permit for use of oversized transport vehicles on Caltrans facilities.

3. **Mitigation Measures**

Mitigation Measure K-1: The Project Applicant shall initiate, fund, and market a Hollywood-area Transportation Management Organization (TMO) to promote alternative modes of transportation including walking and bicycling, carpooling and vanpooling, use of public transit, short-term automobile rentals, etc. This TMO would be available to anyone within the Hollywood community, not just patrons of the proposed Project, and would be accessible through a website and a mobile application providing users with information and allowing them to access TMO services.

Mitigation Measure K-2: The Project Applicant shall pay LADOT to design and install signal controller upgrades, CCTV cameras, and system loops at the locations set forth below, and shown in Figure IV.K-4 in Section IV.K, Traffic, Access, and Parking, of the Draft EIR. These improvements would be implemented by Paramount Pictures through payment of a fixed fee to LADOT to fund the cost of these improvements. If LADOT selects the payment option, then Paramount Pictures would be required to pay LADOT's projected cost of installation, and LADOT shall design and construct these improvements.

The TSM improvements shall target the following four travel corridors: (1) Franklin Avenue (between Cahuenga Boulevard and Bronson Avenue); (2) Santa Monica Boulevard (between La Brea Avenue and Vermont Avenue); (3) Melrose Avenue (between La Brea Avenue and Heliotrope Drive); and (4) Gower Street (between Franklin Avenue and Melrose Avenue).

The following are the locations designated for signal controller upgrades, CCTV, and system loops.

Signal Controller Upgrade Locations:

- Vine Street & Franklin Avenue
- Gower Street & Franklin Avenue
- Beachwood Drive & Franklin Avenue
- Bronson Avenue & Franklin Avenue
- Gower Street & Carlos Avenue
- Gower Street & Sunset Boulevard
- Gower Street & Waring Avenue
- Mansfield Avenue & Melrose Avenue
- June Street & Melrose Avenue
- Cahuenga Boulevard & Melrose Avenue
- Larchmont Boulevard & Melrose Avenue
- Gower Street & Melrose Avenue
- Van Ness Avenue & Melrose Avenue
- Wilton Place & Melrose Avenue
- Harvard Boulevard & Melrose Avenue

- Ardmore Avenue & Melrose Avenue
- Normandie Avenue & Melrose Avenue
- Alexandria Avenue/US 101 Northbound Off-Ramp & Melrose Avenue
- Heliotrope Drive & Melrose Avenue

Closed Circuit Television Locations:

- Highland Avenue & Santa Monica Boulevard
- Normandie Avenue & Melrose Avenue
- Vine Street/Rossmore Avenue & Melrose Avenue

System Loop Locations (Where necessary at signalized intersections within the following corridors):

- Franklin Avenue between Cahuenga Boulevard and Bronson Avenue
- Santa Monica Boulevard between Orange Drive and Vermont Avenue
- Melrose Avenue between La Brea Avenue and Heliotrope Drive
- Gower Street between Franklin Avenue and Melrose Avenue

Mitigation Measure K-3: Intersection #33—Gower Street & Santa Monica Boulevard. Convert the existing northbound shared through/right-turn lane into a separate through lane and right-turn lane by shifting the north/south lanes westward by approximately 1 foot. In order to provide the right-turn lane, two street parking stalls on the east side of Gower Street south of Santa Monica Boulevard would need to be removed. With this improvement, the northbound intersection approach would provide one left-turn lane, one through lane, and one right-turn lane.

Mitigation Measure K-4: Intersection #34—Gower Street & Melrose Avenue. Convert the existing westbound shared through/right-turn lane into a separate through lane and right-turn lane by dedicating necessary right of way for a right-turn curb cut from the Project Site to the north. With this improvement, the westbound intersection approach would provide two through lanes and one right-turn lane.

Mitigation Measure K-5: The Applicant or its successors shall fund and coordinate implementation of LADOT's Neighborhood Traffic Management Plan process set forth in Appendix Q of the Traffic Study prepared for the proposed Project, in an amount up to $500,000. Eligible communities shall include the residential neighborhoods within the boundaries listed below:

- De Longpre Avenue to the north, Gower Street to the east, Santa Monica Boulevard to the south, and Vine Street to the west;
- Sunset Boulevard to the north, Bronson Avenue to the east, Fountain Avenue to the south, and Gordon Street to the west;
- Fountain Avenue to the north, Bronson Avenue to the east, Santa Monica Boulevard to the south, and Gower Street to the west;

- Santa Monica Boulevard to the north, Wilton Place to the east, Melrose Avenue to the south, and Van Ness Avenue to the west; and
- Santa Monica Boulevard to the north, Western Avenue to the east, Lemon Grove Avenue to the south, and Wilton Place to the west.

4. **Findings**

Specific economic, legal, social, technological or other considerations make infeasible additional mitigation measures or project alternatives identified in the EIR.

5. **Rationale for Findings**

a) Intersection Level of Service

(1) **Existing With Project with Mitigation**

With the implementation of the proposed Project's TDM program and mitigation program, under Existing with Project conditions, Project impacts at 63 of the 65 signalized intersections would be reduced to less than significant levels. Significant impacts would remain at the following two intersections: (1) Intersection No. 31: Gower Street & Sunset Boulevard (morning peak hour); and (2) Intersection No. 44: Van Ness Avenue & Santa Monica Boulevard (afternoon peak hour).

With implementation of the proposed Project's TDM program and mitigation measures set forth in the MMP, the potential significant impact at the unsignalized intersection of Gower Street & US-101 Southbound Off-Ramp/Yucca Street would be reduced to a less than significant level. While the installation of a traffic signal at the intersection of Western Avenue & US-101 Northbound On-Ramp would reduce this potential impact to a less than significant level, this intersection does not meet LADOT's criteria for signalization. The decision on whether a traffic signal will be installed at this location is made by the governing jurisdictions taking into consideration other factors such as spacing with adjacent signalized intersections and interruption to traffic flow along the major street. If a traffic signal control was not installed at this location, a significant and unavoidable impact would remain at the unsignalized intersection based on the *City of Los Angeles CEQA Thresholds Guide* criteria.

(2) **Future With Project with Mitigation**

With the implementation of the proposed Project's TDM program and mitigation measures set forth in the MMP, Project impacts at 61 of the 65 signalized intersections would be reduced to less than significant levels. Significant impacts would remain at the following four signalized intersections: (1) Intersection No. 31: Gower Street & Sunset Boulevard (morning peak hour); (2) Intersection No. 44: Van Ness Avenue & Santa Monica Boulevard (afternoon peak hour); (3) Intersection No. 49: Wilton Place & Melrose Avenue (afternoon peak hour); and (4) Intersection No. 54: Western Avenue & Santa Monica Boulevard (morning peak hour).

With implementation of the proposed Project's TDM program and mitigation measures set forth in the MMP, the significant impact at the unsignalized intersection of Normandie Avenue & US-101 NB On-Ramp/Monroe Street would be reduced to a less than significant level. While the installation of a traffic signal at the intersection of Gower Street & US 101 Southbound Off-

Ramp/Yucca Street meets LADOT's criteria, the intersection of Western Avenue & US-101 Northbound On-Ramp does not meet LADOT's criteria for signalization.

The decision on whether a traffic signal will be installed is made by the governing jurisdictions taking into consideration other factors such as spacing with adjacent signalized intersections and interruption to traffic flow along the major street. If a traffic signal control was not installed at these two locations, a significant and unavoidable impact would remain based on the *City of Los Angeles CEQA Thresholds Guide* criteria.

b) Neighborhood Intrusion

Implementation of the proposed Project's TDM program and mitigation measures set forth in the MMP may reduce the proposed Project's neighborhood intrusion impacts to a less than significant level. The identified neighborhood intrusion mitigation measure would be applied to the boundaries of the identified neighborhoods to ensure that the cut-through traffic diverted from these neighborhoods moves to the neighboring arterial and collector streets does not result in a neighborhood impact at another neighborhood. However, as at this time it is not known whether consensus will be reached among the residents in the affected neighborhoods on the implementation of the neighborhood intrusion mitigation measure or if the agreed upon measure will reduce the impacts to less than significance, to be conservative, it is concluded that mitigation of the potential neighborhood intrusion impact will not be feasible. Therefore, it is conservatively concluded that a significant Project-level traffic intrusion impact in the identified neighborhoods would remain. Such impacts would also be considered cumulatively significant.

c) In-Street Construction

Project impacts related to intersection operations during construction would be less than significant. Even with implementation of the project design features and mitigation measures set forth in the MMP, the proposed Project could result in temporary construction impacts associated with the loss of on-street parking, sidewalk closures, and relocation of bus stops. These potential impacts would be considered significant on a Project-level and cumulative basis.

d) Supplemental Caltrans Analysis

In addition, while Caltrans does not have published criteria for determining potential impacts to its facilities, to be conservative, a supplemental analysis of Caltrans facilities according to Caltrans guidelines is presented in Appendix K of the Traffic Study included in Appendix Q of the Draft EIR. As summarized in this supplemental Caltrans analysis additional unsignalized intersections and freeway mainline segments may be impacted by the Project before mitigation. The mitigation measures identified above would provide traffic signal control, which would improve operating conditions at the unsignalized intersections. However, not all of the unsignalized intersections meet signal warrants, which are a component of LADOT's criteria for signalization. Even if an intersection meets signal warrants, the decision on whether a traffic signal will be installed will be made by the governing jurisdictions by taking into consideration other factors, such as spacing with adjacent signalized intersections and interruption to traffic flow along the major street. With regard to freeway mainline segments, generally Caltrans has determined that there are no mitigation measures that a single project can feasibly implement that would directly reduce mainline impacts to a less than significant level. Caltrans instead requires that the applicant pay its fair share of any feasible

improvements that Caltrans may implement at significantly impacted segments. The Project Applicant will work with Caltrans to determine an equitable share of a feasible improvement for potential Project impacts, if any. There is the potential that feasible mitigation for any such impacts is not available; therefore, it is conservatively concluded that a significant Project-level impact on Caltrans facilities would remain. Such impacts would also be considered cumulatively significant.

6. **Reference**

For a complete discussion of environmental impacts with respect to traffic, access, and parking, please see Section IV.K, Traffic, Access, and Parking, of the Draft EIR and Section II of the Final EIR.

E. Solid Waste (Operations)

1. Discussion of Effects

a) Operational Impacts

The transport of Project-generated solid waste to waste management/disposal facilities would continue to occur along existing solid waste routes of travel. As such, the proposed Project would not result in the need for additional solid waste collection routes to adequately handle Project-generated waste. The proposed uses would result in an approximate 3,807 ton-per-year (approximately 10 tons per day) net increase in solid waste generation over that produced by the existing mix of entertainment production uses on the Project Site. During 2012, approximately 4,112 tons of waste were generated at the Project Site. Thus, upon full buildout of the proposed Project, the Project Site would be expected to generate approximately 7,919 tons of solid waste per year (or approximately 20.5 tons per day). Assuming a diversion rate of approximately 70 percent based on implementation of Project Design Feature L.3-2, the net increase in solid waste disposal associated with the proposed Project would be approximately 1,142 tons per year or approximately 3 tons per day, which would represent approximately 0.001 percent of the estimated remaining Class III landfill capacity available to the City of Los Angeles as of 2011. As set forth in the Annual Report, the County anticipates that it would be able to adequately serve future disposal needs through 2026. At this time, it is not possible to project the available landfill capacity in 2038 (the Project buildout year). Various factors, including future County development and/or expansion of landfills, use of new waste-by-rail facilities, development of new conversion technologies, etc., will ultimately determine the available landfill capacity in 2038. While it is anticipated that future iterations of the Los Angeles County Integrated Waste Management Plan Annual Reports would provide for improvements beyond 2026 to serve future waste disposal needs, it is conservatively assumed that no new landfills or increases in capacity would occur. Thus, based on this worst case assumption, the County may not be able to accommodate the disposal needs of the proposed Project. Therefore, the proposed Project's impacts to solid waste disposal facilities in 2038 are conservatively concluded to be potentially significant.

b) Cumulative Impacts

Per the Annual Report, the forecasted 2026 waste generation volume for the County is approximately 27.6 million tons. The estimated Project generation net increase of approximately 3,807 tons of waste per year would represent a limited percentage (approximately 0.01 percent) of the cumulative waste generation in 2026. Thus, the proposed Project's contribution to the County's

cumulative waste stream for the last forecasted year available would not be substantial. Nonetheless, while it is anticipated that future iterations of the County Integrated Waste Management Plan Annual Reports would provide for improvements to serve future waste disposal needs, it is conservatively assumed that no new landfills or increases in capacity would occur. Thus, based on this worst case assumption, the County may not be able to accommodate the disposal needs of future growth, including the proposed Project and the interim projects, through 2038. Therefore, cumulative impacts on solid waste disposal facilities are conservatively concluded to be potentially significant.

2. **Project Design Features**

Project Design Feature L.3-2: During operations, the proposed Project shall have a solid waste diversion target of 70 percent based on current available recycling practices, including off-site sorting of waste by third party vendors, permitted by the Los Angeles Municipal Code.

3. **Mitigation Measures**

Project-level and cumulative impacts with regard to solid waste would be reduced to the extent feasible through the above project design feature, and no other feasible mitigation measures have been identified.

4. **Findings**

Specific economic, legal, social, technological or other considerations make infeasible additional mitigation measures or project alternatives identified in the EIR.

5. **Rationale for Findings**

While the existing landfills serving Project Site have adequate capacity to accommodate Project-related disposal needs, due to the uncertainty in future availability and capacity of these landfills over the entire buildout period for the proposed Project, it is conservatively assumed that the proposed Project's operational impacts to landfill capacity would remain significant and unavoidable. Likewise, cumulative impacts with regard to regional landfill disposal capacity would also remain significant and unavoidable. It should be noted that the identification of additional landfills is generally addressed at the City and County levels (e.g., through the County's Countywide Siting Element) and, as such, is not under the control of the individual Project. Other than waste minimization and diversion, which are project design features, no other feasible mitigation measures have been identified to address this significant impact.

6. **Reference**

For a complete discussion of environmental impacts with respect to solid waste, please see Section IV.L.3, Utilities and Service Systems – Solid Waste, of the Draft EIR.

X. ALTERNATIVES TO THE PROPOSED PROJECT

A. Summary of Findings

Based upon the following analysis, the City finds, pursuant to CEQA Guidelines section 15096(g)(2), that no alternative within its powers would substantially lessen or avoid any significant effect the Project would have on the environment.

B. Project Objectives

An important consideration in the analysis of alternatives to the proposed Project is the degree to which such alternatives would achieve the objectives of the proposed Project. To facilitate this comparison, the objectives of the proposed Project contained in Section II, Project Description, of the Draft EIR were compared to the alternatives.

The underlying purpose of the proposed Project is to maintain and enhance studio operations, invest in new state-of-the-art soundstages and high-tech production facilities, and create entertainment jobs in Hollywood while respecting the studio's history. The proposed Project provides the opportunity to evaluate the entire studio lot to improve synergy and efficiencies that are critical to preparing for the future.

C. Project Alternatives

In accordance with CEQA Guidelines Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate alternatives from detailed consideration is the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. As discussed in Section V., Alternatives, of the Draft EIR, numerous alternatives were considered and seven were retained for further analysis in the EIR as discussed below.

1. Alternative A: No Project Alternative—Continued Operation of Existing Campus

a) Description of Alternative

Alternative A, the No Project—Continued Operation of Existing Campus Alternative, assumes the Project would not be approved, no new permanent development or land uses would be introduced within the Project Site, and the existing environment would be maintained. The existing uses within the Main Lot and the Ancillary Lots would continue to operate as they do currently. Temporary sets (both interior and exterior) would continue to be constructed and removed on a regular basis as part of ongoing studio operations, and regular maintenance and upkeep of existing buildings would continue to occur. However, no new permanent structures would be constructed or new permanent land uses introduced. Unlike the proposed Project, future development under Alternative A would not be guided by a Specific Plan.

b) Impact Summary of Alternative A

Alternative A would reduce to a less-than-significant level all of the significant impacts that would occur with the proposed Project, including: shading during operation; air quality during construction and operation; noise and vibration during construction; traffic intersection levels of service during operation; neighborhood traffic intrusion during operation; in-street construction impacts associated with the loss of on-street parking, sidewalk closures, and relocation of bus stops during construction; and solid waste generation during operation. Alternative A would result in the avoidance of most of the adverse, less than significant impacts anticipated to occur with the development of the proposed Project, including among other things: land use compatibility, operational noise, geology and soils, public services, water, and wastewater. On the other hand, Alternative A would not have the same beneficial effect as the proposed Project in terms of creating new jobs. Additionally, Alternative A would be less consistent than the proposed Project with applicable employment growth plans and policies of the Southern California Association of Governments (SCAG) and the City.

c) Finding

Overall, Alternative A would reduce adverse environmental impacts when compared with the development of the proposed Project. Therefore, this Alternative would be an environmentally superior alternative to the Project. However, Alternative A would not address any of the project objectives. It is found pursuant to Public Resources Code Section 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including considerations identified in Section XII of these Findings (Statement of Overriding Considerations), make infeasible the No Project Alternative described in the EIR.

d) Rationale for Finding

No new permanent development or land uses would be introduced on the Project Site under Alternative A, and the existing uses on the Project Site would continue to operate as they do currently. As such, Alternative A would not meet any of the proposed Project's objectives or the proposed Project's underlying purpose to maintain and enhance studio operations, invest in new state-of-the-art soundstages and high-tech production facilities, and create entertainment jobs in Hollywood while respecting the studio's history.

2. **Alternative B: No Project Alternative—Continued Operation of Existing Campus With Predicted Growth**

a) Description of Alternative

Alternative B, the No Project/Continued Operation of Existing Campus With Predicted Growth Alternative, contemplates another reasonably foreseeable scenario that could occur if the proposed Project were not implemented. Under this Alternative, construction would continue to occur on the Project Site in a manner consistent with the development characteristics at Paramount Studios over the past 25 years. In the past 25 years, approximately 351,200 square feet of production office, support, office, and retail uses have been added to the Project Site. It is assumed that Alternative B would result in the removal of approximately 151,200 square feet of production office, support, office, and retail uses, and the construction of approximately 351,200 square feet of new production office, support, office, and retail uses. Overall, this Alternative would result in a net increase of approximately 34,300 square feet of production office uses, 167,800 square feet of office

uses, and 28,400 square feet of retail uses, and a net decrease of approximately 30,500 square feet of support uses on the Project Site. Under Alternative B, less functional buildings and uses would be removed and replaced with new production office, support, office, and retail uses. The existing stages would remain, and no new stage uses would be constructed. Unlike the proposed Project, future development under Alternative B would not be guided by a Specific Plan.

b) Impact Summary of Alternative B

Alternative B would reduce to a less-than-significant level some of the significant impacts that would occur with the proposed Project, including: shading during operation; air quality during construction and operation; neighborhood traffic intrusion during operation; and in-street construction impacts associated with the loss of on-street parking, sidewalk closures, and relocation of bus stops during construction. Alternative B would reduce but not avoid the proposed Project's significant and unavoidable impacts related to: noise and vibration during construction; traffic intersection levels of service during operation; and solid waste generation during operation. In addition, Alternative B would result in new significant impacts with regard to greenhouse gas emissions, historic resources, archaeological and paleontological resources, and operational noise, as compared to the proposed Project which would have less than significant impacts in these areas. Alternative B would result in the reduction but not the elimination of some of the adverse, less than significant impacts anticipated to occur with the development of the proposed Project, including among other things: land use compatibility, geology and soils, public services, water, and wastewater. Alternative B would not have the same beneficial effect as the proposed Project in terms of creating new jobs. Additionally, Alternative B would be less consistent than the proposed Project with applicable employment growth plans and policies of the Southern California Association of Governments (SCAG) and the City.

c) Finding

Overall, Alternative B would reduce some adverse environmental impacts when compared with the development of the proposed Project but would not eliminate all of the proposed Project's significant impacts. In addition, Alternative B would generate additional significant impacts. Alternative B would not fully meet any of the proposed Project's objectives. Rather, this Alternative would only partially meet or be incompatible with some of the proposed Project's objectives. It is found pursuant to Public Resources Code Section 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including considerations identified in Section XII of these Findings (Statement of Overriding Considerations), make infeasible Alternative B described in the EIR.

d) Rationale for Finding

Overall, Alternative B represents a greatly reduced scope of development compared to the proposed Project. New development would be implemented in a manner that is consistent with the characteristics of development at Paramount Studios over the past 25 years and would not be subject to a Specific Plan. As such, Alternative B would not create a singular, cohesive, and integrated campus that is guided by a unified set of development guidelines and standards. Therefore, Alternative B would not substantially enhance the role of the Project Site in the movie, television, and entertainment industry. While Alternative B would modernize and upgrade the facilities at the Project Site to some degree, the limited improvements would not meet the increased competition for movie, television, and entertainment production and post-production facilities from

other states or worldwide locations. Alternative B would not provide new state-of-the-art and technologically advanced soundstages, production offices, and post-production areas within the Project Site to meet the anticipated future demand of the movie, television, and entertainment industry or allow flexibility to incorporate future technology advances. While some new employment opportunities would be created, Alternative B would not maximize opportunities for the local and regional economy by creating construction jobs or a wide range of jobs. Without the establishment of unified design guidelines and standards through the adoption of a Specific Plan, the extent to which Alternative B would improve the identity of the Project Site as a movie, television, and entertainment industry area and enhance the visual appearance of the Project Site while preserving the historic character of the Project Site would be uncertain and greatly reduced in comparison to the proposed Project. Alternative B would not fully meet any of the proposed Project's objectives. Rather, this Alternative would only partially meet or be incompatible with some of the proposed Project's objectives, and it would not meet the underlying purpose of the proposed Project to maintain and enhance studio operations, invest in new state-of-the-art soundstages and high-tech production facilities, and create entertainment jobs in Hollywood while respecting the studio's history to the same extent as the proposed Project.

3. Alternative C: Reduced Density Alternative—20 Percent Reduction

a) Description of Alternative

Alternative C, the Reduced Density Alternative—20 Percent Reduction, would represent an overall reduction in net new Project development by approximately 20 percent. This alternative assumes that the reduction would occur mostly within the office uses, and that with the related reduction in office employees the need for support uses would also be reduced. The amount of net new stage, production office, and retail uses would be the same or substantially similar to that of the proposed Project. Alternative C would result in the removal of approximately 536,600 square feet of stage, production office, support, office, and retail uses and the development of approximately 1,638,400 square feet of new stage, production office, support, office, and retail uses. This would result in a net increase of approximately 1,101,800 square feet of floor area within the Project Site. Alternative C would involve the construction of 111,100 square feet of stage uses, 722,200 square feet of production office uses, 144,600 square feet of support uses, 568,500 square feet of office uses, and 92,000 square feet of retail uses. Like the proposed Project, Alternative C would be implemented under a Specific Plan that would guide development within the Project Site through the year 2038.

b) Impact Summary of Alternative C

Alternative C would not eliminate any of the significant impacts that would occur with the proposed Project. Alternative C would result in similar significant and unavoidable impacts related to shading during operation and solid waste generation during operation. Alternative C would reduce but not eliminate the significant impacts related to: air quality during construction and operation; noise and vibration during construction; traffic intersection levels of service during operation; neighborhood traffic intrusion during operation; and temporary in-street construction impacts associated with the loss of on-street parking, sidewalk closures, and relocation of bus stops during construction. Alternative C would result in the reduction but not the elimination of some of the adverse, less than significant impacts anticipated to occur with the development of the proposed Project, including among other things: land use compatibility, geology and soils, public services,

water, and wastewater. Alternative C would not have the same level of beneficial effect as the proposed Project in terms of creating new jobs. Additionally, Alternative C would be less consistent than the proposed Project with applicable employment growth plans and policies of the Southern California Association of Governments (SCAG) and the City.

c) Finding

Overall, Alternative C would reduce some adverse environmental impacts when compared with the development of the proposed Project but would not eliminate any of the proposed Project's significant impacts. Alternative C would meet or partially meet most of the proposed Project's objectives, but to a lesser extent than the proposed Project, and would not meet some of the Project objectives due to the reduced amount of net new floor area compared to the proposed Project and net loss of support floor area. It is found pursuant to Public Resources Code Section 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including considerations identified in Section XII of these Findings (Statement of Overriding Considerations), make infeasible Alternative C described in the EIR.

d) Rationale for Finding

Alternative C would construct a similar mix of land uses as the proposed Project but with an approximate 20 percent reduction in overall square footage. Therefore, Alternative C would enhance the role of the Project Site in the movie, television, and entertainment industry, and in so doing, contribute to the preservation of Hollywood as the international focus for the movie, television, and entertainment industry, but to a lesser extent than the proposed Project. Alternative C would modernize and upgrade the facilities at the Project Site and provide new state-of-the-art and technologically advanced soundstages, production offices, and post-production areas within the Project Site, but to a lesser extent than the proposed Project. Alternative C would enhance opportunities for the local and regional economy by creating construction jobs and a wide range of jobs and production crew jobs, but to a lesser extent than the proposed Project. Alternative C would result in a net loss of support area on the Project Site, and as such, would not provide new production support facilities and expand employee amenities and increase gathering spaces for employees. Alternative C would meet or partially meet most of the proposed Project's objectives, but to a lesser extent than the proposed Project, and would not meet some of the Project objectives due to the reduced amount of net new floor area compared to the proposed Project and net loss of support floor area. Overall, Alternative C would meet the underlying purpose to maintain and enhance studio operations, invest in new state-of-the-art soundstages and high-tech production facilities, and create entertainment jobs in Hollywood while respecting the studio's history, but to a lesser extent than the proposed Project, and Alternative C would not eliminate any of the proposed Project's significant impacts.

4. **Alternative D: Reduced Density Alternative—50 Percent Reduction**

a) Description of Alternative

Alternative D, the Reduced Density Alternative—50 Percent Reduction, represents an overall reduction in net new Project development by approximately 50 percent. This alternative assumes that the reduction would occur mostly within the production office and office uses, and that with the related reduction in the office employees the need for support uses would also be reduced. The

amount of net new stage and retail uses would be substantially similar to that of the proposed Project. Given the existing physical constraints on the Project Site, Alternative D would remove approximately 536,600 square feet of stage, production office, support, office, and retail uses and develop approximately 1,215,200 square feet of new stage, production office, support, office, and retail uses. This would result in a net increase of approximately 678,600 square feet of floor area within the Project Site. Alternative D would involve the construction of 111,100 square feet of stage uses, 434,100 square feet of production office uses, 144,600 square feet of support uses, 433,400 square feet of office uses, and 92,000 square feet of retail uses. Like the proposed Project, Alternative D would be implemented under a Specific Plan that would guide development within the Project Site through the year 2038.

b) Impact Summary of Alternative D

Alternative C would reduce the following significant impacts that would occur with the proposed Project to a less-than-significant level: air quality during operation; and traffic intersection levels of service during operation (Existing Plus Project). Alternative D would reduce but not eliminate the significant impacts related to: air quality during construction; noise and vibration during construction; traffic intersection levels of service during operation (Future Plus Project); neighborhood traffic intrusion during operation; temporary in-street construction impacts associated with the loss of on-street parking, sidewalk closures, and relocation of bus stops during construction; and solid waste generation during operation. Alternative D would result in similar significant and unavoidable impacts related to shading during operation. Alternative D would result in the reduction but not the elimination of some of the adverse, less than significant impacts anticipated to occur with the development of the proposed Project, including among other things: land use compatibility, geology and soils, public services, water, and wastewater. Alternative D would not have the same beneficial effect as the proposed Project in terms of creating new jobs. Additionally, Alternative D would be less consistent than the proposed Project with applicable employment growth plans and policies of the Southern California Association of Governments (SCAG) and the City.

c) Finding

Overall, Alternative D would reduce adverse environmental impacts when compared with the development of the proposed Project. Alternative D would meet or partially meet some of the proposed Project's objectives, but would not meet the majority of the objectives due to the reduced amount of net new floor area compared to the proposed Project and net loss of support floor area. It is found pursuant to Public Resources Code Section 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including considerations identified in Section XII of these Findings (Statement of Overriding Considerations), make infeasible Alternative D described in the EIR.

d) Rationale for Finding

Alternative D would construct a similar mix of land uses as the proposed Project but with an approximate 50 percent reduction in overall square footage. With this limited amount of net new development, Alternative D would not substantially enhance the role of the Project Site in the movie, television, and entertainment industry. While Alternative D would modernize and upgrade the facilities at the Project Site to some extent, the reduced amount of net new floor area would not meet the increased competition for movie, television, and entertainment production and post-production

facilities from other states or worldwide locations. Similarly, while Alternative D would provide new state-of-the-art and technologically advanced soundstages, production offices, and post-production areas within the Project Site, the limited amount of net new floor area would not meet the anticipated future demand of the movie, television, and entertainment industry and allow flexibility to incorporate future technology advances. While some job opportunities would be created, Alternative D would not maximize opportunities for the local and regional economy by creating construction jobs and a wide range of jobs, including production crew jobs, serving the movie, television, and entertainment industry. Alternative D would not provide new producers, writers, talent and other creative personnel, and related administrative personnel with enough offices, work spaces, and general offices to meet the demand for the movie, television, and entertainment industry and to remain competitive with other production facilities in the region and worldwide. Because it would result in a net loss of support area on the Project Site, Alternative D would not provide new production support facilities or expand employee amenities and increase gathering spaces for employees. , Alternative D would meet or partially meet some of the proposed Project's objectives, but would not meet the majority of the objectives due to the reduced amount of net new floor area compared to the proposed Project and net loss of support floor area. Overall, Alternative D would generally meet the underlying purpose to maintain and enhance studio operations, invest in new state-of-the-art soundstages and high-tech production facilities, and create entertainment jobs in Hollywood while respecting the studio's history, but to a much lesser extent than the proposed Project. However, Alternative D would not achieve objectives related to meeting the increased competition for movie, television, and entertainment production and post-production facilities from other states or worldwide locations and meeting the future demand of the movie, television, and entertainment industry. Further, even with an approximate 50 percent reduction in overall square footage, Alternative D would not eliminate all of the proposed Project's significant impacts.

5. Alternative E: Alternative Land Use—New Residential Uses With Decreased Office Uses

a) Description of Alternative

Alternative E, the Alternative Land Use—New Residential Uses With Decreased Office Uses Alternative, would introduce residential uses to the Project Site and reduce the amount of proposed office, production office, and support uses. Given the mix of uses in the surrounding area, Alternative E is included to evaluate the inclusion of residential uses on the Project Site. Alternative E would replace approximately 450,700 square feet of the proposed Project's production office and office uses and approximately 2,200 square feet of support uses with approximately 380 multi-family residential units, and 27,200 square feet of additional retail uses. As compared to the proposed Project a slightly greater amount of demolition would occur, totaling approximately 556,800 square feet. Overall, Alternative E would develop approximately 1,896,800 square feet of new stage, production office, support, office, retail, and residential uses,[3] resulting in a net increase of approximately 1,340,000 square feet of net new floor area within the Project Site upon completion of this Alternative. Alternative E would involve the construction of 111,100 square feet of stage uses, 630,300 square feet of production office uses, 261,400 square feet of support uses, 394,800 square feet of office uses, 119,200 square feet of retail uses, and 380,000 square feet of residential uses. This Alternative would result in a total site-wide floor area that is slightly less than that of the proposed Project. The layout of this Alternative would differ from that of the proposed Project in that the residential uses and the majority of the retail uses would be concentrated in the southwest

[3] The assumed size of each residential unit is 1,000 square feet.

corner of the Main Lot and separated from the studio by a perimeter wall. Like the proposed Project, Alternative E would be implemented under a Specific Plan that would guide development within the Project Site through the year 2038.

b) Impact Summary of Alternative E

Alternative E would not eliminate any of the significant impacts that would occur with the proposed Project. Alternative E would reduce but not eliminate the significant impacts related to traffic intersection levels of service during operation. Alternative E would result in similar significant and unavoidable impacts related to: shading during operation; air quality during construction and operation; noise and vibration during construction; in-street construction impacts associated with the loss of on-street parking, sidewalk closures, and relocation of bus stops during construction; and solid waste generation during operation. Significant impacts with regard to neighborhood traffic intrusion during operation would be similar or greater under Alternative E. Alternative E would result in similar or reduced less than significant impacts anticipated to occur with the development of the proposed Project; however, Alternative E would result in greater less than significant impacts with regard to: aesthetics/visual quality during operation; light/glare during operation; land use consistency; land use compatibility; parks and recreation; libraries; wastewater; solid waste during construction; and energy during operation. In addition, Alternative E would not have the same level of beneficial effect as the proposed Project in terms of creating new jobs. Additionally, Alternative E would be less consistent than the proposed Project with applicable employment growth plans and policies of the Southern California Association of Governments (SCAG) and the City, including City policies related to employment.

c) Finding

Overall, Alternative E would not reduce adverse environmental impacts when compared with the development of the proposed Project. Alternative E would meet or partially meet most of the proposed Project's objectives, but to a lesser extent than the proposed Project, and would not meet the project objective to provide new production support facilities due to the net loss of support floor area compared to the proposed Project. It is found pursuant to Public Resources Code Section 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including considerations identified in Section XII of these Findings (Statement of Overriding Considerations), make infeasible Alternative E described in the EIR.

d) Rationale for Finding

Alternative E would involve the construction of 380 residential dwelling units and increased retail uses on the Project Site, in addition to a similar mix of stage and support uses as the proposed Project, but with a substantial reduction in office uses, and a net reduction of support uses. In addition, the conversion of a portion of the Project Site to residential use would result in the division of the Main Lot by an interior wall. Therefore, Alternative E would substantially enhance the role of the Project Site in the movie, television, and entertainment industry, but to a lesser extent than the proposed Project. While Alternative E would modernize and upgrade the facilities at the Project Site, the limited amount of net new office area and net loss of support area would not meet the increased competition for movie, television, and entertainment production and post-production facilities from other states or worldwide locations. Similarly, while Alternative E would provide new state-of-the-art and technologically advanced soundstages, production offices, and post-production areas within the

Project Site, the limited amount of net new office area and net loss of support area would not meet the anticipated future demand of the movie, television, and entertainment industry and allow flexibility to incorporate future technology advances. Alternative E would not maximize opportunities for the local and regional economy by creating construction jobs and a wide range of jobs, including production crew jobs, serving the movie, television, and entertainment industry. Alternative E would improve the identity of the Project Site as a movie, television, and entertainment industry area and enhance the visual appearance of the Project Site, but to a lesser extent than the proposed Project as the Gower Street/Melrose Avenue corner would no longer be visually integrated with the rest of the Studio under Alternative E. While Alternative E would provide offices, work spaces, and general offices, the limited amount of net new office area would not meet the demand for the movie, television, and entertainment industry and allow the Applicant to remain competitive with other production facilities in the region and worldwide. Alternative E would result in a net loss of support area, and as such, would not provide new production support facilities and expand employee amenities and increase gathering spaces for employees to meet increased demand for facilities. Alternative E would meet or partially meet most of the proposed Project's objectives, but to a lesser extent than the proposed Project, and would not meet the project objective to provide new production support facilities due to the net loss of support floor area compared to the proposed Project. Overall, Alternative E would meet the underlying purpose to maintain and enhance studio operations, invest in new state-of-the-art soundstages and high-tech production facilities, and create entertainment jobs in Hollywood while respecting the studio's history, but to a lesser extent than the proposed Project.

6. Alternative F: Alternative Land Use—Increased Retail Uses With Substantially Decreased Office Uses

a) Description of Alternative

Alternative F, the Alternative Land Use—Increased Retail Uses With Substantially Decreased Office Uses Alternative, represents a different configuration of land uses with a substantial reduction in office and production office uses, an increase in retail uses, and a minor reduction in support uses, and with a total floor area less than that of the proposed Project. The increased retail uses would serve the Project Site and surrounding neighborhood. Alternative F would replace approximately 450,700 square feet of the proposed Project's production office and office uses and approximately 17,600 square feet of support uses, with approximately 115,500 square feet of retail uses. As compared to the proposed Project a slightly greater amount of demolition would occur, totaling approximately 556,800 square feet. Overall, approximately 1,589,700 square feet of new stage, production office, support, office, and retail uses would be developed, resulting in a net increase of approximately 1,032,900 square feet of floor area within the Project Site upon completion of this Alternative. Alternative F would involve the construction of 111,100 square feet of stage uses, 630,300 square feet of production office uses, 246,000 square feet of support uses, 394,800 square feet of office uses, and 207,500 square feet of retail uses. As compared to the proposed Project, this Alternative would result in the same amount of stage uses, a minor reduction in support uses, a reduction in production office floor area, a substantial reduction in office area, and a notable increase in retail uses, with a total site-wide floor area less than that of the proposed Project. The layout of this Alternative would differ from that of the proposed Project in that the majority of the retail uses would be concentrated in the southwest corner of the Main Lot and separated from the studio by a perimeter wall. Like the proposed Project, Alternative F would be

implemented under a Specific Plan that would guide development within the Project Site through the year 2038.

b) Impact Summary of Alternative F

Alternative F would not eliminate any of the significant impacts that would occur with the proposed Project. Alternative F would reduce but not eliminate the significant impacts related to: air quality during construction and operation; noise and vibration during construction; traffic intersection levels of service during operation; and in-street construction impacts associated with the loss of on-street parking, sidewalk closures, and relocation of bus stops during construction. Alternative F would result in similar significant and unavoidable impacts related to: shading during operation; neighborhood traffic intrusion during operation; and solid waste generation during operation. Alternative F would result in the reduction but not the elimination of some of the adverse, less than significant impacts anticipated to occur with the development of the proposed Project, including among other things: geology and soils, public services, water, and wastewater. Alternative F would result in similar less than significant impacts with regard to historic resources, land use compatibility, and operational noise, among other issues. However, Alternative F would result in greater less than significant impacts with regard to: aesthetics/visual quality during operation; light/glare during operation; land use consistency; and solid waste during construction. In addition, Alternative F would not have the same level of beneficial effect as the proposed Project in terms of creating new jobs. Additionally, Alternative F would be less consistent than the proposed Project with applicable employment growth plans and policies of the Southern California Association of Governments (SCAG) and the City, including City policies related to employment.

c) Finding

Overall, Alternative F would have similar effects as compared with the development of the proposed Project. Alternative F would meet or partially meet most of the proposed Project's objectives, but to a lesser extent than the proposed Project, and would not meet the project objective to provide new production support facilities, due to the net loss of support floor area compared to the proposed Project. It is found pursuant to Public Resources Code Section 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including considerations identified in Section XII of these Findings (Statement of Overriding Considerations), make infeasible Alternative F described in the EIR.

d) Rationale for Finding

Alternative F would involve the construction of the same types of land uses as the proposed Project but with a substantial reduction in office and production office space, a minor reduction of support space, and more retail space, resulting in a total site-wide floor area less than that of the proposed Project. In addition, the retail area in the southwest corner of the Project Site would require the division of the Main Lot by an interior wall. Specifically, Alternative F would enhance the role of the Project Site in the movie, television, and entertainment industry, and in so doing, contribute to the preservation of Hollywood as the international focus for the movie, television, and entertainment industry but to a lesser extent than the proposed Project. While Alternative F would modernize and upgrade the facilities at the Project Site, the limited amount of net new floor area associated with the studio, and the focus on retail area, would meet the increased competition for movie, television, and entertainment production and post-production facilities from other states or worldwide locations to a

lesser extent than the proposed Project. Similarly, while Alternative F would provide new state-of-the-art and technologically advanced soundstages, production offices, and post-production areas within the Project Site, the reduced amount of net new floor area associated with the studio, and the focus on retail area, would meet to a lesser extent than the proposed Project the anticipated future demand of the movie, television, and entertainment industry and allow flexibility to incorporate future technology advances. Alternative F also would improve the identity of the Project Site as a movie, television, and entertainment industry area and enhance the visual appearance of the Project Site, but to a lesser extent than the proposed Project as the Gower Street/Melrose Avenue corner would no longer be visually integrated with the rest of the Studio under Alternative F. Alternative F would result in a net loss of support area, and as such, would not provide new production support facilities and expand employee amenities and increase gathering spaces for employees to meet increased demand for facilities. Alternative F would meet or partially meet most of the proposed Project's objectives, but to a lesser extent than the proposed Project, and would not meet the project objective to provide new production support facilities, due to the net loss of support floor area compared to the proposed Project. Overall, Alternative F would meet the underlying purpose to maintain and enhance studio operations, invest in new state-of-the-art soundstages and high-tech production facilities, and create entertainment jobs in Hollywood while respecting the studio's history, but to a lesser extent than the proposed Project.

7. Alternative G: Alternative Land Use—Increased Retail Uses With Moderately Decreased Office Uses

a) Description of Alternative

Alternative G, the Alternative Land Use—Increased Retail Uses With Moderately Decreased Office Uses Alternative, represents a different configuration of land uses, with a moderate reduction in production office and office uses and an increase in retail uses, with a total floor area that would be somewhat less than the proposed Project. The increased retail uses would serve the Project Site and the surrounding neighborhood. Alternative G would replace approximately 229,600 square feet of the proposed Project's production office and office uses and approximately 17,600 square feet of support uses with approximately 86,800 square feet of retail uses. As compared to the proposed Project a slightly greater amount of demolition would occur, totaling approximately 556,800 square feet. Overall, approximately 1,782,100 square feet of new stage, production office, support, office, and retail uses would be developed, resulting in a net increase of approximately 1,225,300 square feet of floor area within the Project Site upon completion of this Alternative. Alternative G would involve the construction of 111,100 square feet of stage uses, 630,300 square feet of production office uses, 246,000 square feet of support uses, 615,900 square feet of office uses, and 178,800 square feet of retail uses. The layout of this Alternative would differ from that of the proposed Project, with the majority of the retail uses concentrated in the southwest corner of the Main Lot and separated from the studio by a perimeter wall. Like the proposed Project, Alternative G would be implemented under a Specific Plan that would guide development within the Project Site through the year 2038.

b) Impact Summary of Alternative G

Alternative G would not eliminate any of the significant impacts that would occur with the proposed Project. Alternative G would reduce but not eliminate the significant impacts related to: traffic intersection levels of service during operation; and neighborhood traffic intrusion during

operation. Alternative G would result in similar significant and unavoidable impacts related to: shading during operation; air quality during construction and operation; noise and vibration during construction; in-street construction impacts associated with the loss of on-street parking, sidewalk closures, and relocation of bus stops during construction; and solid waste generation during operation. Alternative G would result in the reduction but not the elimination of some of the adverse, less than significant impacts anticipated to occur with the development of the proposed Project, including among other things: geology and soils, public services, water, and wastewater. Alternative G would result in similar less than significant impacts with regard to historic resources, land use compatibility, and operational noise, among other issues. However, Alternative G would result in greater less than significant impacts with regard to: aesthetics/visual quality during operation; light/glare during operation; land use consistency; and solid waste during construction. In addition, Alternative G would not have the same beneficial effect as the proposed Project in terms of creating new jobs. Additionally, Alternative G would be less consistent than the proposed Project with applicable employment growth plans and policies of the Southern California Association of Governments (SCAG) and the City, including City policies related to employment.

c) Finding

Overall, Alternative G would have similar effects as compared with the development of the proposed Project. Alternative G would meet or partially meet most of the proposed Project's objectives, but to a lesser extent than the proposed Project, and would not meet the project objective to provide new production support facilities due to the net loss of support floor area. It is found pursuant to Public Resources Code Section 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including considerations identified in Section XII of these Findings (Statement of Overriding Considerations), make infeasible Alternative G described in the EIR.

d) Rationale for Finding

Alternative G would involve the construction of the same types of land uses as the proposed Project but with less office and production office space, a net loss of support space, and more retail space, resulting in a total site-wide floor area that is slightly less than that of the proposed Project. In addition, the retail/office area in the southwest corner of the Project Site would require the division of the Main Lot by an interior wall. Overall, Alternative G would substantially enhance the role of the Project Site in the movie, television, and entertainment industry, and in so doing, contribute to the preservation of Hollywood as the international focus for the movie, television, and entertainment industry, but to a slightly lesser extent than the proposed Project. Alternative G would modernize and upgrade the facilities at the Project Site to meet the increased competition for movie, television, and entertainment production and post-production facilities from other states or worldwide locations, but to a slightly lesser extent than the proposed Project. Alternative G would improve the identity of the Project Site as a movie, television, and entertainment industry area and enhance the visual appearance of the Project Site, but to a lesser extent than the proposed Project as the Gower Street/Melrose Avenue corner would no longer be visually integrated with the rest of the Studio under Alternative G. Alternative G would provide a campus environment and incorporate and integrate a mix of uses that maximizes synergies and efficiencies within the Project Site, but to a lesser extent than the proposed Project due to the separation of the southwest corner of the Main Lot. In addition, Alternative G would establish clear guidelines for the preservation of the historic character of the Project Site while allowing for the development of state-of-the-art facilities for the

movie, television and entertainment industry. Alternative G would result in a net loss of support area on the Project Site, and as such, would not provide new production support facilities for storage and on-lot distribution of lighting, props, and other equipment, and expand employee amenities and increase gathering spaces for employees to meet increased demand for facilities to the same extent as the Project. Alternative G would meet or partially meet most of the proposed Project's objectives, but to a lesser extent than the proposed Project, and would not meet the project objective to provide new production support facilities due to the net loss of support floor area. Overall, Alternative G would meet the underlying purpose to maintain and enhance studio operations, invest in new state-of-the-art soundstages and high-tech production facilities, and create entertainment jobs in Hollywood while respecting the studio's history, but to a lesser extent than the proposed Project.

D. Environmentally Superior Alternative

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

Alternative A, the No Project/Continued Operation of Existing Campus Alternative, would reduce all of the proposed Project's significant Project-level and cumulative impacts to a less than significant level. In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than a No Project Alternative, a comparative evaluation of the remaining alternatives indicates that Alternative D, the Reduced Density Alternative—50 Percent Reduction, would reduce the greatest number of Project impacts and have the fewest significant and unavoidable impacts. On this basis, Alternative D is considered the Environmentally Superior Alternative. Specifically, the reduction in floor area occurring under this Alternative would likely avoid the proposed Project's significant operational air quality impacts with regard to regional emissions, as well as the proposed Project's significant operational traffic (intersection levels of service) impacts under Existing with Project with Mitigation conditions, but not Future with Project with Mitigation intersection conditions. Additionally, although Alternative D would not avoid the proposed Project's significant impacts with regard to construction-related air quality, construction noise and vibration, operational traffic (intersection levels of service under Future with Project with Mitigation conditions and neighborhood intrusion), in-street construction traffic, and operational solid waste, the intensity of these significant impacts would be reduced in comparison to the proposed Project. It should also be noted that Alternative D would not reduce the proposed Project's significant shading impacts, and the degree to which Alternative D would result in beneficial effects with regard to employment generation would be less than that of the proposed Project. With regard to cumulative impacts, Alternative D would avoid the proposed Project's significant cumulative impacts associated with operational air quality and would reduce (but not avoid) the remaining significant cumulative impacts of the proposed Project. With less overall development, Alternative D also would have incrementally fewer impacts for those remaining issues where the amount of development influences the impact, including population and housing, public services, and utilities. However, Alternative D would not meet the majority of the Project objectives, including Project Objectives 1, 2, 3, 5, 7, 9, and 10, due to the reduced amount of net new floor area compared to the proposed Project and the net loss of support floor area compared to existing conditions.

XI. FINDINGS REGARDING GENERAL IMPACT CATEGORIES

A. Potential Secondary Effects

Section 15126.4(a)(1)(D) of the state CEQA Guidelines requires mitigation measures to be discussed in less detail than the significant effects of the proposed project if the mitigation measure(s) cause one or more significant effects in addition to those that would be caused by the proposed project. In accordance with the CEQA Guidelines, proposed mitigation measures that could cause potential impacts were evaluated. The following provides a discussion of the potential secondary environmental effects that could occur as a result of implementing mitigation measures.

Mitigation Measure K-3 set forth in the MMP addresses significant impacts at the intersection of Gower Street and Santa Monica Boulevard. This mitigation measure includes the conversion of the existing northbound shared through/right-turn lane into a separate through lane and right-turn lane by shifting the north/south lanes westward by approximately 1 foot. In order to provide the right-turn lane, up to two street parking stalls on each side of Gower Street south of Santa Monica Boulevard would need to be removed. As discussed in the LADOT Assessment Letter, LADOT reviewed and approved the mitigation measures, including Mitigation Measure K-3, and a copy of the August 28, 2015, LADOT Assessment Letter is included as Appendix R of the Draft EIR. Although on-street parking stalls would remain in the Project vicinity and the proposed Project would provide more parking spaces on the Project Site than required by the LAMC to accommodate parking for all guests, implementation of Mitigation Measure K-3 is conservatively concluded to result in an adverse secondary impact with respect to the loss of up to four on-street parking spaces.

B. Growth Inducing Impacts

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

Because the proposed Project would not include any new residential development, it would not result in direct population growth. However, the proposed Project would have the potential to generate indirect population growth in the Project vicinity as a result of the new employees generated by the proposed Project. Construction workers would not relocate their households' places of residence as a direct consequence of working on the proposed Project for the reasons discussed in Section IV.I.2, Housing, of the Draft EIR. Therefore, given the availability of local

workers, the proposed Project would not be considered growth inducing from a short-term employment perspective, but rather the proposed Project would provide a public benefit by providing new direct and indirect employment opportunities during the construction period. As discussed in Section IV.I.1, Employment, of the Draft EIR, it is estimated that the proposed Project would directly add 5,493 new direct jobs once all proposed improvements have been constructed and are in full operation, thereby adding to the developed urban community in and around Hollywood. The additional full and part-time jobs directly associated with annual operation of the completed proposed Project would be consistent with SCAG's employment forecasts for the City of Los Angeles Subregion. In addition, the indirect housing/household demand and population growth that could be generated by the proposed Project would be consistent with SCAG's housing and population forecasts for the City of Los Angeles Subregion.

The property surrounding the Project Site is currently developed with a mix of commercial, industrial, and residential uses. All roadway improvements planned for the proposed Project would be tailored to improve circulation flows within the Project Site and the immediate Project vicinity. Utility and other infrastructure upgrades are intended primarily to meet Project-related demand. The Project employees' demand for convenience commercial goods and services would be met by new retail and support uses included as part of the proposed Project or already located within close proximity to the Project Site. No new off-site development would be needed to specifically meet the commercial demands associated with the Project Site employees.

In addition, the proposed Project falls within the projected water supplies for normal, single-dry, and multiple-dry years and LADWP found that it will be able to meet the water demand for the proposed Project, as well as existing and planned water demands of its future service area. Furthermore, the proposed Project's additional wastewater flows would not substantially or incrementally exceed the future scheduled capacity of any treatment plant by generating flows greater than those anticipated in the Integrated Resources Plan. Therefore, the proposed Project would not require the expansion of existing water entitlements or upgrades to any wastewater treatment facilities, and as such, would not be considered growth-inducing in this regard.

While the proposed Project may require local infrastructure upgrades to maintain and improve water, sewer, electricity, and natural gas lines on-site and in the immediate vicinity of the Project Site, the proposed Project would not necessitate regional utility infrastructure improvements that have not otherwise been accounted for and planned for on a regional level. In addition, all roadway improvements planned for the proposed Project or as mitigation are intended to provide for better circulation flows within the Project Site and the immediate Project vicinity, and would not open any large undeveloped areas for new use. As such, growth-inducing impacts associated with utilities and circulation systems would be less than significant.

C. Significant Irreversible Impacts

In accordance with Section 15126.2(c) of the CEQA Guidelines, an EIR is required to evaluate significant irreversible environmental changes that would be caused by implementation of the proposed Project. As stated in CEQA Guidelines Section 15126.2(c):

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter

unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

The proposed Project would necessarily consume limited, slowly renewable, and non-renewable resources, resulting in irreversible environmental changes. This consumption would occur during construction of the proposed Project and would continue throughout its operational lifetime. The development of the proposed Project would require a commitment of resources that would include: (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources (e.g., petroleum-based fuels) for electricity, natural gas, and transportation and the associated impacts related to air quality. However, the consumption of such resources would not be considered substantial and would be consistent with regional and local growth forecasts and development goals for the area. The loss of such resources would not be highly accelerated when compared to existing conditions and such resources would not be used in a wasteful manner. Therefore, although irreversible environmental changes would result from the proposed Project, such changes are concluded to be less than significant.

XII. OTHER CEQA CONSIDERATIONS

1. The City of Los Angeles ("the City"), acting through the Department of City Planning, is the "Lead Agency" for the Project evaluated in the EIR. The City finds that the EIR was prepared in compliance with CEQA and the CEQA Guidelines. The City finds that it has independently reviewed and analyzed the EIR for the Project, that the Draft EIR which was circulated for public review reflected its independent judgment and that the Final EIR reflects the independent judgment of the City.

2. The City finds that the EIR provides objective information to assist the decision-makers and the public at large in their consideration of the environmental consequences of the Project. The public review period provided all interested jurisdictions, agencies, private organizations, and individuals the opportunity to submit comments regarding the Draft EIR. The Final EIR was prepared after the review period and responds to comments made during the public review period.

3. The Department of City Planning evaluated comments on environmental issues received from persons who reviewed the Draft EIR. In accordance with CEQA, the Department of City Planning prepared written responses describing the disposition of significant environmental issues raised. The Final EIR provides adequate, good faith and reasoned responses to the comments. The Department of City Planning reviewed and responded to the comments received and has determined that neither the comments received nor the responses to such comments add significant new information regarding environmental impacts to the Draft EIR. The Lead Agency has based its actions on full appraisal of all viewpoints, including all comments received up to the date of adoption of these findings, concerning the environmental impacts identified and analyzed in the EIR.

4. The EIR evaluated the following potential Project and cumulative environmental impacts: Aesthetics (including views, light/glare, and shading); Air Quality (including greenhouse gas emissions); Cultural Resources (including historic resources, and archaeological and paleontological resources); Geology and Soils; Hazards and Hazardous Materials; Hydrology and Surface Water Quality (including groundwater); Land Use and Planning; Noise; Employment, Housing and Population; Public Services (including police protection, fire protection, schools, parks and recreation, and libraries); Traffic, Access, and Parking; and Utilities and Service Systems (including water supply, wastewater, solid waste, and energy). Additionally, the EIR considered, in separate sections, Significant Irreversible Environmental Changes, Growth Inducing Impacts and potential secondary effects of the Project. The significant environmental impacts of the Project and the alternatives were identified in the EIR.

5. The project design features and mitigation measures identified for the proposed Project were included in the Draft EIR and Final EIR. The final project design features and mitigation measures for the proposed Project are described in the Mitigation Monitoring Program ("MMP"). Each of the project design features and mitigation measures identified in the MMP is incorporated into the Project. The City finds that the impacts of the Project have been mitigated to the extent feasible by the project design features and mitigation measures identified in the MMP.

6. Textual refinements and errata were compiled and presented to the decision-makers for review and consideration. The City staff has made every effort to notify the decision-makers and the interested public/agencies of each textual change in the various documents associated with project review. These textual refinements arose for a variety of reasons. First, it is inevitable that draft documents would contain errors and would require clarifications and corrections. Second, textual clarifications were necessitated in order to describe refinements suggested as part of the public participation process.

7. The responses to the comments on the Draft EIR, which are contained in the Final EIR, clarify and amplify the analysis in the Draft EIR.

8. Having reviewed the information contained in the EIR and in the administrative record as well as the requirements of CEQA and the state CEQA Guidelines regarding recirculation of Draft EIRs, the City finds that there is no new significant information in the Final EIR including the Errata and finds that recirculation of the Draft EIR is not required.

9. CEQA requires the Lead Agency approving a project to adopt an MMP for the changes to the project which it has adopted or made a condition of project approval in order to ensure compliance with the mitigation measures during project implementation. The mitigation measures included in the EIR as certified by the City and included in the MMP as adopted by the City serves that function. The MMP includes all of the mitigation measures adopted by the City in connection with the approval of the Project and has been designed to ensure compliance with such measures during implementation of the Project. In accordance with CEQA, the MMP provides the means to ensure that the mitigation measures are fully enforceable. In accordance with the requirements of Public Resources Code §21081.6, the City hereby adopts the MMP.

10. In accordance with the requirements of Public Resources Code §21081.6, the City hereby adopts each of the mitigation measures expressly set forth herein as conditions of approval for the Project.

11. The custodian of the documents or other material which constitute the record of proceedings upon which the City decision is based is the Los Angeles Department of City Planning, 6262 Van Nuys Boulevard, Room 352, Van Nuys, CA 91401.

12. The City finds and declares that substantial evidence for each and every finding made herein is contained in the EIR, which is incorporated herein by this reference, or is in the record of proceedings in the matter.

13. The City is certifying an EIR for, and is approving and adopting findings for, the entirety of the actions described in these Findings and in the EIR as comprising the Project. It is contemplated that there may be a variety of actions undertaken by other State and local agencies (who might be referred to as "responsible agencies" under CEQA). Because the City is the Lead Agency for the Project, the EIR is intended to be the basis for compliance with CEQA for each of the possible discretionary actions by other State and local agencies to carry out the Project.

14. The EIR is a Project EIR for purposes of environmental analysis of the Project. A Project EIR examines the environmental effects of a specific project. The EIR serves as the primary environmental compliance document for entitlement decisions regarding the Project by the City of Los Angeles and the other regulatory jurisdictions.

XIII. STATEMENT OF OVERRIDING CONSIDERATIONS

The EIR has identified unavoidable significant impacts that would result from implementation of the proposed Project. Section 21081 of the California Public Resources Code and Section 15093(b) of the CEQA Guidelines provide that when the decision of the public agency allows the occurrence of significant impacts that are identified in the EIR but are not at least substantially mitigated, the agency must state in writing the reasons to support its action based on the completed EIR and/or other information in the record. State CEQA Guidelines require, pursuant to CEQA Guidelines Section 15093(b), that the decision-maker adopt a Statement of Overriding Considerations at the time of approval of a project if it finds that significant adverse environmental effects have been identified in the EIR which cannot be substantially mitigated to an insignificant level or be eliminated. These findings and the Statement of Overriding Considerations are based on substantial evidence in the record, including but not limited to the EIR, including the reference library to the EIR, and documents and materials that constitute the record of proceedings.

The following impacts are not mitigated to a less than significant level for the Project, as identified in the EIR: shading during operations; air quality during construction and operation; noise and vibration during construction; traffic intersection levels of service during operation; neighborhood traffic intrusion during operation; in-street construction impacts associated with the loss of on-street parking, sidewalk closures, and relocation of bus stops during construction; Caltrans facilities based on supplemental Caltrans analysis; and solid waste generation during operation. In addition, implementation of the proposed Project would result in significant and unavoidable cumulative impacts related to: air quality during construction and operation; noise during construction; traffic intersection levels of service during operation; neighborhood traffic intrusion during operation; in-street construction impacts associated with the loss of on-street parking, sidewalk closures, and relocation of bus stops during construction; Caltrans facilities based on supplemental Caltrans analysis; and solid waste generation during operation.

Accordingly, the City adopts the following Statement of Overriding Considerations. The City recognizes that significant and unavoidable impacts would result from implementation of the proposed Project. Having (i) adopted all feasible mitigation measures, (ii) rejected alternatives to the

proposed Project, as discussed above, (iii) recognized all significant, unavoidable impacts, and (iv) balanced the benefits of the Project against the Project's significant and unavoidable impacts, the City hereby finds that the benefits outweigh and override the significant unavoidable impacts for the reasons stated below.

These overriding considerations of economic, social, aesthetic, and environmental benefits for the Project justify adoption of the Project and certification of the completed EIR. Each of the following overriding considerations separately and independently (i) outweighs the adverse environmental impacts of the Project, and (ii) justifies adoption of the Project and certification of the completed EIR. In particular, achieving the underlying purpose for the Project would be sufficient to override the significant environmental impacts of the Project.

1. The Project will enhance the future economic vitality of the City of Los Angeles by providing growth (a net increase of approximately 1,385,700 square feet of new stage, production office, support, office, and retail uses) in proximity to public transit, and will enhance the role of the Project Site in the movie, television, and entertainment industry and contribute to the preservation of Hollywood as the international focus for the movie, television, and entertainment industry.

2. Development and construction of the Project will generate more than 7,200 part-time and full-time jobs in the Los Angeles County economy, of which over 4,400 jobs are directly related to construction of the Project. Operation of the Project at full buildout will generate more than 12,600 jobs in the Los Angeles economy, of which more than 5,400 jobs are from on-site operations. Overall, the Project will create nearly 20,000 jobs during construction and operations, in accordance with City policies related to employment.

3. Development and construction of the Project includes an estimated $630 million investment in construction costs, with a resulting estimated $1.1 billion economic output to the Los Angeles economy from that construction.

4. The Project also will be a significant economic engine in Los Angeles. The annual economic output from operation of the proposed Project, including employee compensation, is estimated to contribute approximately $3.1 billion in annually to the Los Angeles County economy.

5. Total employee compensation from ongoing operation of the proposed Project will generate approximately $908 million annually in the City, with about 60 percent of this attributable to direct employees and 40 percent to indirect and induced employees.

6. The Project would modernize the Paramount Pictures campus to respond to the evolving and increasingly technological nature of the entertainment business, while respecting the studio's history and creating entertainment jobs in Hollywood. The Project would maintain and enhance studio operations, invest in new state-of-the-art soundstages and high-tech production facilities.

7. The proposed Project's variety of jobs would provide important employment opportunities for part-time and entry-level workers, whose numbers are increasing and who are having difficulty finding sufficient employment in the region's new high technology sectors. The proposed Project would also create higher-skilled, higher-wage positions. The Project is consistent with applicable growth forecasts and regional and local economic development and employment policies.

8. The Project's development and operation of additional studio, production, post-production, and related uses would expand and enhance the Project Site's historic role in the entertainment industry, allowing the incorporation of new technologies and operations and providing for facilities on the Project Site to meet the growing and changing needs of the industry.

9. The proposed Project would directly address a key goal of the Hollywood Community Plan, which is the retention and promotion of Hollywood as an international center for motion picture production. The proposed Project would bring modern facilities and more efficient operations to Paramount Studios, an integral and historic entity in the entertainment industry, and the largest working film and television studio still headquartered in Hollywood. The proposed Project also would be consistent with the overall intent of the Wilshire Community Plan and focus commercial development along the Melrose Avenue commercial corridor, replacing surface parking lots with appropriately designed buildings that are compatible with the character of the surrounding area, including the residential uses to the south.

10. The Project would facilitate a reduction of traffic impacts (and associated greenhouse gas emissions) by preparing and implementing a Transportation Demand Management (TDM) program that encourages employees and patrons to reduce vehicular traffic on the street and freeway system during the most congested time periods of the day. The TDM program would include implementation of several TDM strategies, which may include, but are not limited to the following: (1) flexible work schedules and telecommuting programs; (2) bicycle amenities (bicycle racks, lockers, etc.); (3) a guaranteed ride home program; (4) rideshare/carpool/vanpool promotion and support; (5) transportation information center; (6) on-site TDM coordinator; (7) discounted transit passes; (8) mobility hub support; (9) funding for bikeway improvements; and (10) continued provision of on-site personnel at studio entry gates to facilitate traffic flow onto the Project Site.

11. The Project Applicant would initiate, fund, and market a Hollywood-area Transportation Management Organization (TMO) to promote alternative modes of transportation including walking and bicycling, carpooling and vanpooling, use of public transit, short-term automobile rentals, etc. This TMO would be available to anyone within the Hollywood community, not just patrons of the proposed Project, and would be accessible through a website and a mobile application providing users with information and allowing them to access TMO services.

12. The Project will establish a telephone hotline to enable the public to call and address construction related issues associated with Project construction.

13. Construction and implementation of the Project would institute on-site waste management and recycling programs. During new construction, a minimum of 50 percent of the non-hazardous demolition and construction debris by weight from construction of new Project buildings would be recycled and/or salvaged for reuse. During operations, the Project would have a solid waste diversion target of 70 percent based on current available recycling practices.

14. The Project would incorporate various energy efficient features into the design of new buildings for the proposed Project, including: efficient lighting and lighting control systems; light colored or "cool" roofs; energy-efficient heating and cooling systems, appliances (e.g., Energy Star) and equipment and control systems; light-emitting diodes (LEDs) for on-site street lighting; and education regarding energy efficiency, water conservation, waste diversion, and recycling services to the Project Site employees.

15. The Project would preserve cultural resources, including the potential Paramount Pictures Historic District and the potential RKO Studios Historic District, through the implementation of the Historic Resources Preservation Plan.

XIV. MITIGATION and MONITORING PROGRAM

A Mitigation and Monitoring Program (MMP) has been prepared pursuant to Public Resources Code Section 21081.6, which requires adoption of a MMP for projects in which the Lead Agency has required changes or adopted mitigation to avoid significant environmental effects and is included with the City's determination. The City of Los Angeles is the Lead Agency for the proposed Project and is, therefore, responsible for administering and implementing the MMP. The decision-makers must define specific reporting and/or monitoring requirements to be enforced during the Project implementation prior to final approval of the Project. The primary purpose of the MMP is to ensure that the project design features and mitigation measures identified in the EIR are implemented, thereby minimizing identified environmental effects.

The Project Applicant shall be obligated to provide documentation concerning implementation of the listed Project Design Features and Mitigation Measures to the appropriate Monitoring Agency and the appropriate Enforcement Agency as provided for in the MMP. All departments listed in the MMP are within the City of Los Angeles unless otherwise noted. The entity responsible for the implementation of all Project Design Features and Mitigation Measures shall be the Project Applicant or its successor unless otherwise noted.

Each mitigation measure is categorized by impact area, with an accompanying identification of:

- The enforcement agency;
- The monitoring agency;
    - The monitoring phase (*i.e.*, the phase of the Project during which the measure should be monitored):
        - Pre-construction
        - Construction
        - Operation (prior to and post-occupancy);
- The monitoring frequency; and
- The action indicating compliance with the mitigation measure(s).

The MMP for the Project will be in place throughout all phases of development of the Project. The entity responsible for implementing each Project Design Feature or Mitigation Measure is set forth within the text of the Project Design Feature or Mitigation Measure itself. The entity responsible for implementing the Project Design Feature or Mitigation Measure shall also be obligated to provide certification, as identified below, to the appropriate Monitoring Agency and the appropriate Enforcement Agency that compliance with the required Project Design Feature or Mitigation Measure has been implemented.

After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made by the Project Applicant or its successor subject to the approval by the Lead Agency for Project Design Features and Mitigation Measures applicable to the Lead Agency. In conjunction with any appropriate agencies or departments, the Lead Agency will determine the adequacy of any proposed change or modification. Other responsible agencies have the authority under CEQA to approve their own MMPs for the Project, provided that Mitigation Measures therein address only the direct or indirect environmental effects of those parts of the Project, which the responsible agency decides to carry out, finance, or approve. (Pub. Resources Code § 21081.6(a); CEQA Guidelines §§ 15096(g)(1), 15097(d).) Minor changes and modifications to any MMP approved by a responsible agency can only be made by the Project Applicant or its successor subject to the approval by that responsible agency. Any revisions to a Mitigation Measure in the final MMP or any MMP adopted thereafter by a responsible agency must achieve the same level or more of mitigation as the original mitigation measure.