

## **V. Alternatives**

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# V. Alternatives

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## 1. Introduction

The identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process under CEQA. Public Resources Code (PRC) Section 21002 states, in part, that the environmental review process is intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives which will avoid or substantially lessen such significant effects. If specific economic, social, or other conditions make infeasible such alternatives, individual projects may be approved in spite of one or more significant effects. In addition, PRC Section 21002.1(a) states, in part, that the purpose of an environmental impact report is to identify the significant effects on the environment of a project, identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.

Direction regarding the consideration and discussion of project alternatives in an EIR is provided in CEQA Guidelines Section 15126.6(a), as follows:

*An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. An EIR is not required to consider alternatives which are infeasible.*

The CEQA Guidelines state that the selection of project alternatives should be based primarily on the ability to avoid or substantially lessen significant impacts relative to the proposed project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. The CEQA Guidelines further direct that the range of alternatives be guided by a “rule of reason,” such that only those alternatives necessary to permit a reasoned choice are addressed. In selecting project alternatives for analysis, potential alternatives must be feasible. CEQA Guidelines Section 15126.6(f)(1) states that:

*Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries [...], and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site [...].*

Beyond these factors, CEQA Guidelines Section 15126.6(e) requires the analysis of a “no project” alternative and CEQA Guidelines Section 15126.6(f)(2) requires an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. If the environmentally superior alternative is the No Project Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives.

## **2. Overview of Selected Alternatives**

As indicated above, the intent of the alternatives analysis is to avoid or substantially lessen any of the significant effects of a project. Based on the analysis in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with regard to air quality associated with regional construction emissions, historical resources, on-site and off-site construction noise, and vibration from on-site construction (human annoyance). Implementation of the Project would result in significant cumulative impacts that cannot be feasibly mitigated with regard to air quality associated with regional construction emissions and off-site construction noise. Accordingly, the following alternatives to the Project have been selected for evaluation based on the significant environmental impacts of the Project and the objectives established for the Project (listed in Section II, Project Description, of this Draft EIR):

- Alternative 1: No Project Alternative
- Alternative 2: Preservation and Soundstage Alternative
- Alternative 3: Reduced Excavation Alternative
- Alternative 4: Reduced Intensity Alternative

Each of these alternatives is described in the sections that follow. In addition, CEQA Guidelines Section 15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible, and such alternatives are also discussed below.

### 3. Alternatives Considered and Rejected as Infeasible

As set forth in 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 their rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate an alternative from detailed consideration are 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. Alternatives to the Project that have been considered and rejected as infeasible include the following:

- **Alternatives to Eliminate Significant Noise and Vibration Impacts During Construction:** Alternatives were considered to eliminate the significant short-term construction noise and vibration impacts. As discussed in Section IV.G, Noise, of this Draft EIR, significant on-site and off-site construction noise and significant vibration from on-site construction (human annoyance) would occur during Project construction. Significant construction noise and vibration impacts within the Project Site would be expected to occur with most reduced development scenarios because construction activities, and the need to grade and excavate the Project Site followed by building construction would inherently generate noise and vibration levels above the significance criteria for noise and human annoyance given the proximity of sensitive uses. Specifically, as provided in Section IV.G, Noise, of this Draft EIR, the estimated construction-related noise at receptor location R1 would exceed the significance threshold during Phase 1 and Phase 2 construction. Receptor location R1 is represented by a residential use located approximately 60 feet on the east side of Gordon Street east of the Project Site. Phase 1 construction would involve construction of Building A and the parking structure while Phase 2 construction would involve construction of the below-grade parking. Significant construction noise and vibration impacts within the Project Site would be expected to occur with most reduced development scenarios because construction activities, and the need to grade and excavate the Project Site followed by building construction would inherently generate noise and vibration levels above the significance criteria for noise and human annoyance given the proximity of sensitive uses. Thus, reducing temporary vibration impacts below a level of significance at adjacent uses would not be possible while still achieving the Project's objectives as a significant reduction in the proposed uses would be required. Furthermore, any reduction in the intensity of construction activities on daily basis would actually increase the overall duration of the construction period. Therefore, alternatives to eliminate the Project's short-term noise and vibration impacts during construction were rejected as infeasible.
- **Alternative Project Site:** The Project's objectives are intimately tied to the concept of improving existing operations on the Project Site. Thus, an alternative location would not meet the underlying purpose of the Project to preserve the

tradition of the Sunset Gower Studios of providing television, video, and motion picture production facilities, while supporting the evolving needs of the entertainment industry for compatible office space, enhanced post-production facilities, and other studio-related facilities. Development on an alternative site would result in no changes to existing on-site conditions, which would therefore provide no potential to achieve the basic Project objectives related to modernizing the existing Sunset Gower Studios campus and enhancing the role of the Project Site in the entertainment industry. Furthermore, development on an alternative site would split studio operations into two locations, potentially separated by a great distance, which could threaten the synergies needed to be improved and maximize creativity and production.

In addition, the Project Applicant already owns the Project Site, and it is unlikely that the Applicant would be able to reasonably acquire, control, or have access to an alternative site with similar uses and square footage. Furthermore, it would be expected that if development of the Project were to occur at an alternative site within a similar urban environment, the significant and unavoidable cumulative impacts associated with regional construction emissions, and off-site noise during construction would also occur. Additionally, a site at a different location may not be located near the transit options that are available near the Project Site. Therefore, traffic impacts may be greater at an alternative site because the relocated project may not have the same potential to capture trips through public transit. Furthermore, development of the Project at an alternative site could potentially produce other environmental impacts that would otherwise not occur at the current Project Site. Thus, if an alternative site that could accommodate the Project could be found, development on such a site could result in greater environmental impacts when compared with the Project. Therefore, an alternative site is not considered feasible as it would fail to achieve the underlying purpose and related objectives of the Project. In addition, an alternative site would likely not avoid the Project's significant impacts. Thus, in accordance with Section 15126.6(f) of the State CEQA Guidelines, this alternative was rejected from further consideration.

## **4. Alternatives Analysis Format**

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the project objectives, identified in Section II, Project Description, of this Draft EIR, would be substantially attained by the

alternative.<sup>1</sup> The evaluation of each of the alternatives follows the process described below:

- a. The net environmental impacts of the alternative are determined for each environmental issue area analyzed in Section IV, Environmental Impact Analysis, of this Draft EIR, assuming that the alternative would implement the same project design features and mitigation measures identified in Section IV, Environmental Impact Analysis, of this Draft EIR, as applicable.
- b. Post-mitigation significant and non-significant environmental impacts of the alternative and the Project are compared for each environmental issue area as follows:
  - Less: Where the net impact of the alternative would be clearly less adverse or more beneficial than the impact of the Project, the comparative impact is said to be “less.”
  - Greater: Where the net impact of the alternative would clearly be more adverse or less beneficial than the Project, the comparative impact is said to be “greater.”
  - Similar: Where the impact of the alternative and Project would be roughly equivalent, the comparative impact is said to be “similar.”
- c. The comparative analysis of the impacts is followed by a general discussion of whether the underlying purpose and basic project objectives are feasibly and substantially attained by the alternative.

A summary matrix that compares the impacts associated with the Project with the impacts of each of the analyzed alternatives is provided below in Table V-1 on page V-6.

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<sup>1</sup> *State of California, CEQA Guidelines Section 15126.6 (c).*

**Table V-1**  
**Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project**

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Preservation and Soundstage Alternative	Alternative 3: Reduced Excavation Alternative	Alternative 4: Reduced Intensity Alternative
<b>A. AESTHETICS</b>					
<i>Visual Character<sup>2</sup></i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
<i>Conflict with Applicable Regulations Governing Scenic Quality</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
<b>B. AIR QUALITY</b>					
<i>Regional Emissions</i>					
<i>Construction</i>	Significant and Unavoidable <sup>3</sup>	Less (No Impact)	Similar (Significant and Unavoidable)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)

<sup>2</sup> While this question from Appendix G of the CEQA Guidelines has been removed, this modification occurred subsequent to the preparation of the Initial Study. The Initial Study provided that, for informational purposes, the EIR will discuss the Project's effects on visual character and visual quality of the site and its surroundings.

<sup>3</sup> Cumulative regional emissions during construction would be significant and unavoidable.

**Table V-1 (Continued)**  
**Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project**

<b>Impact Area</b>	<b>Project</b>	<b>Alternative 1: No Project/No Build Alternative</b>	<b>Alternative 2: Preservation and Soundstage Alternative</b>	<b>Alternative 3: Reduced Excavation Alternative</b>	<b>Alternative 4: Reduced Intensity Alternative</b>
<i>Localized Emissions</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
<i>Toxic Air Contaminants</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
<b>C. CULTURAL RESOURCES</b>					
<i>Historical Resources</i>	Significant and Unavoidable	Less (No Impact)	Less (Less Than Significant)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
<i>Archaeological Resources</i>	Less Than Significant with Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
<i>Human Remains</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
<b>D. ENERGY</b>					
<i>Wasteful, inefficient, or unnecessary consumption of Energy Resources</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)



**Table V-1 (Continued)**  
**Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project**

<b>Impact Area</b>	<b>Project</b>	<b>Alternative 1: No Project/No Build Alternative</b>	<b>Alternative 2: Preservation and Soundstage Alternative</b>	<b>Alternative 3: Reduced Excavation Alternative</b>	<b>Alternative 4: Reduced Intensity Alternative</b>
<i>Operation</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Conflict with Plans for Renewable Energy or Energy Efficiency</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<b>E. GEOLOGY AND SOILS (PALEONTOLOGICAL RESOURCES)<sup>4</sup></b>					
<i>Paleontological Resources</i>	Less Than Significant with Mitigation	Less (No Impact)	Greater (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
<b>F. GREENHOUSE GAS EMISSIONS</b>					
<i>Greenhouse Gas Emissions</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
<b>G. LAND USE</b>					
<i>Land Use Consistency</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)

<sup>4</sup> In January 2018, OPR proposed comprehensive updates to the CEQA Guidelines which revised thresholds for aesthetics, air quality, cultural resources, geology and soils, hydrology and water quality, land use and planning, noise, population and housing, transportation, and utilities and service systems. Prior to the release of the revised thresholds, the question or threshold related to potential impacts to paleontological resources was considered under cultural resources. This threshold has since been moved to be addressed under geology and soils.

**Table V-1 (Continued)**  
**Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project**

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Preservation and Soundstage Alternative	Alternative 3: Reduced Excavation Alternative	Alternative 4: Reduced Intensity Alternative
<b>H. NOISE</b>					
<i>Construction</i>					
<i>On-Site Noise</i>	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Less (Significant and Unavoidable)
<i>Off-Site Noise</i>	Significant and Unavoidable <sup>5</sup>	Less (No Impact)	Less (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Less (Significant and Unavoidable)
<i>On-Site Vibration (Building Damage)</i>	Less Than Significant with Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)
<i>On-Site Vibration (Human Annoyance)</i>	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Less (Significant and Unavoidable)
<i>Off-Site Vibration (Building Damage)</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
<i>Off-Site Vibration (Human Annoyance)</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)

<sup>5</sup> Cumulative off-site construction noise would be significant and unavoidable.

**Table V-1 (Continued)**  
**Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project**

<b>Impact Area</b>	<b>Project</b>	<b>Alternative 1: No Project/No Build Alternative</b>	<b>Alternative 2: Preservation and Soundstage Alternative</b>	<b>Alternative 3: Reduced Excavation Alternative</b>	<b>Alternative 4: Reduced Intensity Alternative</b>
<i>Operation</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
<b>I. PUBLIC SERVICES</b>					
<i>Fire Protection</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
<i>Police Protection</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
<b>J. TRANSPORTATION</b>					
<i>Conflict with Plans</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Vehicle Miles Traveled</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
<i>Hazardous Design Features</i>	No Impact	Less (No Impact)	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)
<i>Emergency Access</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)

**Table V-1 (Continued)**  
**Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project**

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Preservation and Soundstage Alternative	Alternative 3: Reduced Excavation Alternative	Alternative 4: Reduced Intensity Alternative
<b>K. TRIBAL CULTURAL RESOURCES</b>					
<i>Tribal Cultural Resources</i>	No Impact	Less (No Impact)	Similar (No Impact)	Less (No Impact)	Similar (No Impact)
<b>L. UTILITIES AND SERVICE SYSTEMS</b>					
<i>Water Supply and Infrastructure</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Wastewater</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
<i>Energy and Telecommunications Infrastructure</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
<i>Telecommunications</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
<i>Source: Eyestone Environmental, 2020.</i>					

## **V. Alternatives**

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### **A. Alternative 1: No Project Alternative**

#### **1. Description of the Alternative**

In accordance with the CEQA Guidelines, the No Project Alternative for a development project on an identifiable property consists of the circumstance under which a proposed project does not proceed. CEQA Guidelines Section 15126.6(e)(3)(B) states that “in certain instances, the No Project Alternative means ‘no build’ wherein the existing environmental setting is maintained.” Accordingly, for purposes of this analysis, Alternative 1, the No Project Alternative, assumes that the Project would not be approved and no new development would occur within the Project Site. Thus, the physical conditions of the Project Site would generally remain as they are today. Under Alternative 1, the Project Site would continue to be developed with approximately 616,600 square feet of floor area, consisting of approximately 379,000 square feet of creative office space, 56,000 square feet of production support, approximately 175,000 square feet of sound stages, and approximately 6,500 square feet of restaurant, as well as three parking structures and 1,400 square feet of service areas.

#### **2. Environmental Impacts**

##### **a. Aesthetics**

As discussed in Section IV.A, Aesthetics, of this Draft EIR, the Project Site is identified by the City as being located within a transit priority area. In addition, the Project is an employment center project and is located on an infill site which meets Public Resources Code Section 21099’s definition of an infill site as a lot located within an urban area that has been previously developed. The Project Site is also located within 0.5 mile from several bus lines, the majority of which provide a frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. Therefore, pursuant to Senate Bill 743 and Zoning Information File 2452, the Project’s aesthetic impacts shall not be considered significant impacts on the environment. As such, the analysis included in Section IV.A, Aesthetics, of this Draft EIR, is provided for informational purposes only.

## (1) Visual Character<sup>6</sup>

### *(a) Construction*

Under Alternative 1, no construction activities would occur, and, as such, no changes in the visual character of the Project Site would result. Therefore, there would be no potential for construction activities to affect the visual character of the area on a short-term basis under Alternative 1, and no impacts would occur. Thus, impacts to visual character during construction would be less when compared to the less-than-significant impacts of the Project.

### *(b) Operation*

Under Alternative 1, the existing buildings would remain, and the Project would not be developed. As such, Alternative 1 would not require the removal of existing buildings on the Project Site as proposed by the Project or introduce new buildings on the Project Site. Therefore, Alternative 1 would not change the visual character of the Project Site. No operational impacts related to visual character would occur under Alternative 1. Thus, impacts to visual character during operation would be less when compared to the less-than-significant impacts of the Project.

## (2) Conflict with Applicable Regulations Governing Scenic Quality

Under Alternative 1, no construction activities would occur and the existing buildings would remain. Therefore, Alternative 1 would have no potential to conflict with applicable zoning and other regulations governing scenic quality. No impacts would occur, and such impacts would be less compared to the less-than-significant impacts of the Project.

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<sup>6</sup> As previously noted, subsequent to the release of the Initial Study for the Project, the State CEQA Guidelines Appendix G threshold questions were revised. Prior to the release of the revised thresholds, the substantial degradation of the existing visual character or quality of a site and its surrounding was evaluated under aesthetics. The threshold has since been replaced by a new threshold question that considers whether a project would conflict with applicable zoning and other regulations governing scenic quality. However, as the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, stated that the Project's potential effects related to visual character and quality would be addressed in the EIR, this analysis is included for information purposes only.

## **b. Air Quality**

### **(1) Regional Emissions**

#### *(a) Construction*

Alternative 1 would not require any construction activities on the Project Site. Therefore, Alternative 1 would not result in any construction emissions associated with construction worker and construction truck traffic, fugitive dust from demolition and excavation, or the use of heavy-duty construction equipment. Therefore, construction-related regional air quality impacts would not occur. As such, Alternative 1 would eliminate the significant and unavoidable impacts of the Project associated with regional construction emissions. Thus, impacts related to regional air quality emissions during construction would be less under Alternative 1 when compared to the significant and unavoidable impact of the Project.

#### *(b) Operation*

Alternative 1 would not result in new development or increased operations that could generate additional operational emissions related to vehicular traffic or the consumption of electricity and natural gas beyond what is currently generated by the existing uses. Therefore, no operational air quality impacts associated with regional emissions would occur under Alternative 1, and such impacts would be less when compared to the less-than-significant impacts of the Project.

### **(2) Localized Emissions**

#### *(a) Construction*

As previously discussed, Alternative 1 would not result in any construction emissions associated with construction worker and construction truck traffic, fugitive dust from demolition and excavation, or the use of heavy-duty construction equipment. Therefore, construction-related localized air quality impacts would not occur. Thus, impacts related to localized air quality emissions during construction would be less under Alternative 1 when compared to the less-than-significant impacts of the Project.

#### *(b) Operation*

Alternative 1 would not result in new development or increased operations that could generate additional operational emissions related to vehicular traffic or the consumption of electricity and natural gas beyond what is currently generated by the existing uses. Therefore, no operational air quality impacts associated with localized emissions would

occur under Alternative 1, and such impacts would be less when compared to the less-than-significant impacts of the Project.

### (3) Toxic Air Contaminants

#### *(a) Construction*

Since construction activities would not occur on the Project Site, the No Project Alternative would not result in diesel particulate emissions during construction that could generate substantial toxic air contaminants (TACs). Therefore, no impacts associated with the release of TACs would occur under Alternative 1. As such, TAC impacts under the No Project Alternative would be less when compared to the less-than-significant impacts of the Project.

#### *(b) Operation*

The No Project Alternative would not result in new development or increase the intensity of the existing uses on the Project Site. Therefore, no new increase in mobile source emissions and their associated TACs would occur. No operational impacts associated with TACs would occur under the No Project Alternative, and such impacts would be less when compared to the less-than-significant impacts of Project.

## **c. Cultural Resources**

### (1) Historical Resources

As discussed in Section IV.C, Cultural Resources, of this Draft EIR, the Project would demolish 15 buildings within the boundary of the potential historic district, including six contributing buildings. In addition, the Project would result in a significant and unavoidable impact associated with the removal of the United Recording Building at 6050 Sunset Boulevard, which is eligible for listing in the National Register, California Register, and as a Los Angeles Historic-Cultural Monument. The No Project Alternative would not create a historic district on the studio lot or include the development and implementation of a Historic Resources Plan to guide preservation activities as proposed by the Project. While no demolition, grading, or other earthwork activities that could potentially affect any on- or off-site historical resources would occur under the No Project Alternative, the No Project Alternative would not include the preservation activities included in the Historic Resources Plan proposed by the Project. As such, impacts to historical resources would not occur under the No Project Alternative, and the No Project Alternative would eliminate the Project's significant and unavoidable impact to a historical resource. Therefore, historical resources impacts under Alternative 1 would be less when compared to the significant and unavoidable impacts of the Project.



## (2) Archaeological Resources

As discussed above, no grading or earthwork activities would occur under the No Project Alternative. Therefore, there would be no potential for Alternative 1 to uncover subsurface archaeological resources. As such, no impacts to archaeological resources would occur, and impacts would be less when compared to the impacts of the Project, which would be less than significant with mitigation.

## (3) Human Remains

No grading or other earthwork activities would occur under the No Project Alternative. Therefore, there would be no potential for Alternative 1 to uncover human remains. As such, no impacts to human remains would occur, and impacts would be less when compared to the less-than-significant impacts of the Project.

### **d. Energy**

#### (1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

##### *(a) Construction*

Construction activities would not occur under the No Project Alternative. Therefore, Alternative 1 would not generate a short-term demand for energy during construction, which could result in the wasteful, inefficient, or unnecessary consumption of energy resources. Thus, construction-related impacts to energy would not occur. As such, impacts under the No Project Alternative would be less when compared to the less-than-significant impacts of the Project.

##### *(b) Operation*

The No Project Alternative would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the long-term energy demand on the Project Site and would have no potential to result in the wasteful, inefficient, or unnecessary consumption of energy resources. It is noted however that the Project would replace existing older buildings with modern buildings incorporating the latest City Green Building Code requirements, thereby improving the energy efficiency of buildings. Notwithstanding, no operational impacts related to energy would occur under the No Project Alternative, and impacts would be less when compared to the less-than-significant impacts of the Project.

## (2) Conflict with Plans for Renewable Energy or Energy Efficiency

The No Project Alternative would not involve any new development. As such, Alternative 1 would not have the potential to conflict with plans for renewable energy or energy efficiency. No impacts related to renewable energy or energy efficiency plans would occur under the No Project Alternative, and impacts would be less when compared to the less-than-significant impacts of the Project.

### **e. Geology and Soils (Paleontological Resources)**

No grading or other earthwork activities would occur under the No Project Alternative. Therefore, there would be no potential for Alternative 1 to uncover subsurface paleontological resources. As such, no impacts to paleontological resources would occur, and impacts would be less when compared to the impacts of the Project, which would be less than significant with mitigation.

### **f. Greenhouse Gas Emissions**

The No Project Alternative would not develop new uses on the Project Site. Therefore, no new greenhouse gas (GHG) emissions would be generated under Alternative 1 and new impacts associated with global climate change would not occur. As such, impacts associated with GHG emissions under the No Project Alternative would be less when compared to the less-than-significant impacts of the Project.

### **g. Land Use**

Under the No Project Alternative, there would be no changes to the physical or operational characteristics of the existing on-site uses. No land use approvals or permits would be required. Therefore, Alternative 1 would have no potential to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. No impacts associated with a conflict with land use plans, policies, or regulations would occur, and impacts would be similar than the less-than-significant impacts of the Project.

### **h. Noise**

#### (1) Noise

##### *(a) Construction*

No new construction activities would occur under the No Project Alternative. Therefore, no construction-related noise would be generated on-site or off-site. As such,

no on-site or off-site noise impacts would occur under Alternative 1, and impacts would be less when compared to those of the Project, which would be significant and unavoidable for both on-site and off-site construction noise. This alternative would therefore eliminate the Project's impacts with respect to on-site and off-site construction noise and would be less when compared to the Project's significant and unavoidable on-site and off-site noise impacts.

*(b) Operation*

The No Project Alternative would not develop new uses on the Project Site, and no changes to existing site operations would occur. As such, no noise impacts associated with operation of the Project Site under Alternative 1 would occur and impacts would be less when compared to the less-than-significant operational impacts of the Project.

**(2) Vibration**

No new construction activities would occur under the No Project Alternative. Therefore, no construction-related vibration would be generated on-site or off-site under Alternative 1. As such, no on-site or off-site vibration impacts would occur under Alternative 1, and impacts would be less when compared to those of the Project, which would be less than significant with mitigation for on-site construction vibration (building damage), significant and unavoidable for on-site construction vibration (human annoyance), and less than significant for off-site construction vibration (with respect to both building damage and human annoyance).

**i. Public Services**

**(1) Fire Protection**

As the No Project Alternative would not involve any construction activities, Alternative 1 would not have the potential for construction activities to expose people to the risk of fire or explosion related to the use of hazardous materials or to potentially impact the provision of fire protection services in the vicinity of the Project Site during construction. In addition, no changes to existing land uses or operations on-site would occur under the No Project Alternative. Therefore, there would be no potential to increase the level of activity on the Project Site or increase the service population for the Los Angeles Fire Department (LAFD) stations that serve the Project Site. As such, no impacts to fire protection would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

## (2) Police Protection

As the No Project Alternative would not involve any construction activities, Alternative 1 would not have the potential for construction to create sources of nuisances and hazards or potentially impact police protection services in the vicinity of the Project Site. In addition, no changes to existing land uses or operations on-site would occur under the No Project Alternative. Therefore, there would be no potential to increase the service population on-site or have the potential to increase calls for police protection services from the Los Angeles Police Department (LAPD). Overall, no impacts to police protection services would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

## j. Transportation

Since the No Project Alternative would not develop new or additional land uses on the Project Site, Alternative 1 would not generate any additional vehicle trips or alter existing access or circulation within the Project Site during operation. Therefore, no impacts would occur with respect to operational traffic, including conflicts with programs, plans, ordinances, or policies addressing the circulation system; vehicle miles traveled (VMT); hazardous design features; and emergency access. Therefore, impacts under Alternative 1 would be less when compared to the Project, which would be less than significant.

## k. Tribal Cultural Resources

No grading and other earthwork activities would occur under the No Project Alternative. Therefore, there would be no potential for Alternative 1 to uncover subsurface tribal cultural resources. As such, no impacts to tribal cultural resources would occur, and impacts would be less when compared to the less-than-significant impacts of the Project.

## l. Utilities and Service Systems

### (1) Water Supply

#### *(a) Construction*

Construction activities would not occur under the No Project Alternative. Therefore, Alternative 1 would not generate a short-term demand for water during construction, and construction-related impacts to water supply and infrastructure would not occur. In addition, the No Project Alternative would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the long-term water demand on the Project Site. As such, no impacts to water supply and water infrastructure

would occur under the No Project Alternative, and impacts would be less when compared to the less-than-significant impacts of the Project.

## (2) Wastewater

### *(a) Construction*

Construction activities would not occur under the No Project Alternative. Therefore, Alternative 1 would not generate wastewater during construction and construction-related impacts to the wastewater conveyance and treatment infrastructure would not occur. In addition, the No Project Alternative would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the wastewater flow on the Project Site. As such, no impacts related to wastewater conveyance or treatment would occur under the No Project Alternative, and impacts would be less when compared to the less-than-significant impacts of the Project.

## (3) Energy and Telecommunications Infrastructure

### *(a) Energy Infrastructure*

Construction activities would not occur under the No Project Alternative. Therefore, Alternative 1 would not generate a short-term demand for energy during construction, and construction-related impacts to energy infrastructure would not occur. In addition, the No Project Alternative would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the long-term energy demand on the Project Site. As such, no impacts related to energy infrastructure would occur under the No Project Alternative, and impacts would be less when compared to the less-than-significant impacts of the Project.

### *(b) Telecommunications Infrastructure*

No construction activities would occur under the No Project Alternative. Alternative 1 would not require construction of new on-site telecommunications infrastructure to serve new buildings and potential upgrades and/or relocation of existing telecommunications infrastructure. In addition, no upgrades to off-site telecommunications systems would occur. As such, no impacts related to telecommunications infrastructure would occur under the No Project Alternative, and impacts would be less when compared to the less-than-significant impacts of the Project.

## 3. Comparison of Impacts

The No Project Alternative would eliminate the Project's significant and unavoidable environmental impacts, including those related to regional air quality emissions during

construction, historical resources, on- and off-site construction noise, and vibration from on-site construction with respect to human annoyance. Furthermore, Alternative 1 would avoid the significant and unavoidable cumulative regional air quality impacts during construction of the Project as well as the Project's cumulative construction noise impacts from off-site construction. Alternative 1 would also eliminate all of the Project's remaining impacts that are less-than-significant and less-than-significant with mitigation as no changes to the existing conditions would occur.

## **4. Relationship of the Alternative to Project Objectives**

Under the No Project Alternative, the existing uses would remain on the Project Site and no new development would occur. As such, Alternative 1 would not meet the underlying purpose of the Project or the Project objectives. Specifically, Alternative 1 would not meet the following Project objectives:

- Consistent with the objective of the Hollywood Community Plan to further the development of Hollywood as a major center of entertainment and to perpetuate its image as the international center of the motion picture industry, substantially enhance the existing studio/media-related office and office production uses within an existing studio campus to ensure continued viability of the studios.
- In support of the objective of the Hollywood Community Plan to promote economic well-being and public convenience through encouraging the revitalization of the motion picture industry, create a secure campus environment where media and entertainment related uses are consolidated with production, post-production, and administrative offices in order to maximize creativity and productivity.
- Consistent with the objective of the General Plan to maintain significant historic and architectural districts while allowing for the development of economically viable uses, establish clear guidelines for the preservation of the historic character of the Project Site while providing an upgraded office space and production-supporting uses on the Project Site in a manner that respects and preserves the majority of identified historic resources and districts.
- Enhance an existing studio site along a transit corridor and within a high activity area where media and entertainment related uses are consolidated with production, post-production, and administrative offices in one site to promote sustainability and reduces vehicle miles traveled, with associated reductions in air quality and greenhouse gas emissions.
- Design and construct economically-viable and new state-of-the-art and technologically advanced creative office and production support spaces with the

integrated density, infrastructure, parking, and technology to attract high-quality media and creative office tenants to a key corridor in Hollywood and to meet the existing and anticipated future demand of the movie, television, and entertainment industry and to allow flexibility to incorporate future technology advances.

- Provide an enhanced studio campus environment that creates new media-related employment opportunities serving movie, television, and entertainment industries, as well as construction jobs, providing opportunities for local and regional economic growth for a rapidly growing neighborhood residential population and locate jobs on a site that is easily accessible through public transportation.
- 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.
- Provide adequate and safe parking that satisfies the unique demand of the entertainment industry with direct access to the proposed uses, including truck circulation and maintenance of the production “basecamp” to allow for the flexible and efficient staging of trucks and trailers needed for film and television productions, and to enhance efficiency and safety.

Overall, the No Project Alternative would not meet the Project’s underlying purpose to provide television, video, and motion picture production facilities, while supporting the evolving needs of the entertainment industry for compatible office space, enhanced post-production facilities, and other studio-related facilities.

## **V. Alternatives**

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### **B. Alternative 2: Preservation and Soundstage Alternative**

#### **1. Description of the Alternative**

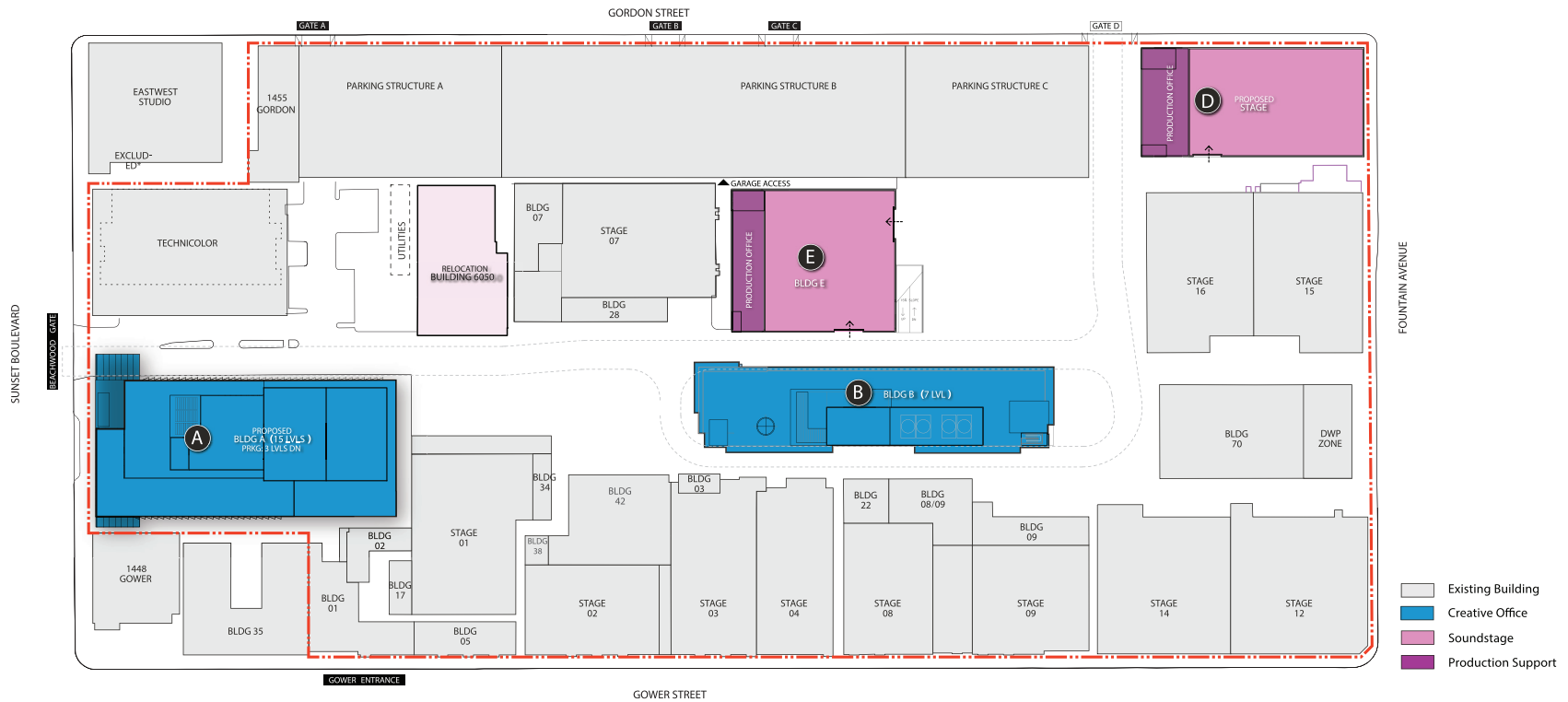
As shown in Figure V-1 on page V-24, the Preservation and Soundstage Alternative would develop the Project Site similar to the Project as it relates to the development of Building A and Building B. However, Alternative 2 would preserve the United Recording Building, located at 6050 Sunset Boulevard, by relocating the building to the interior of the Project Site. As detailed in Section IV.C, Cultural Resources, of this Draft EIR, the United Recording Building is a historic resource. Alternative 2 would reallocate floor area proposed under the Project as part of Building A to accommodate the development of the two new soundstages and production support space (Building D and Building E). As such, Building A would be reduced in height by three floors and approximately 60 feet and would be approximately 240 feet in height. In addition, Alternative 2 would increase the height of Building B by approximately two floors and approximately 48 feet and would be approximately 137 feet in height. Building C, as proposed by the Project, would be eliminated. To accommodate for the relocation of the United Recording Building within the Project Site, four existing buildings including, Building 43, Building 48, Building 49, and Building 50 would be removed. Of these buildings proposed to be removed, Building 49 is a contributor to the potential historic district. Contributing buildings number 38 and 42, proposed to be removed by the project, would be retained as part of this alternative. Building 08/09 and Building 9 proposed to be removed by the Project would also be retained as part of the Preservation and Soundstage Alternative.

Overall, Alternative 2 would develop a total of 619,942 square feet of floor area<sup>7</sup> (a reduction of 8,015 square feet of floor area compared to the Project's proposed 627,957 square feet of floor area). When considering the existing buildings proposed to be removed as part of Alternative 2, which would total 130,169 square feet, as compared to the Project's 160,611 square feet proposed for removal, Alternative 2 would result in a net increase of 489,773 square feet of new floor area on the Project Site (compared to the Project's net increase of 467,346 square feet of new floor area).

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<sup>7</sup> Includes proposed 1,000-square-foot bicycle parking facility.





**Figure V-1**  
Alternative 2 Conceptual Site Plan

As shown in Figure V-1 on page V-24, similar to the Project, Building A would be located along Sunset Boulevard. Building B and one soundstage/office building (Building E) would be centrally located within the Project Site while the second soundstage/office building (Building D) would be located along Gordon Street. In addition, the United Recording Building would be relocated adjacent to Building 7 and Parking Structure A.

The height of Building A would be reduced from 18 stories and a height of approximately 300 feet to 15 stories and a height of approximately 240 feet, Building B would increase to seven stories with a height of approximately 137 feet, and Building D and Building E would contain up to three stories with a height of approximately 60 feet.

The overall design of the buildings under Alternative 2, including architectural features, lighting and signage, and sustainability, would be similar to that of the Project. Alternative 2 would also feature similar vehicular, pedestrian, and bicycle access as the Project, as illustrated in Figure V-1.

Parking would be provided similar to the Project as it relates to providing parking below the existing basecamp and below Building A. Specifically, the Preservation and Soundstage Alternative proposes to provide a total of 1,244 new spaces as follows: (1) up to 629 spaces within four subterranean parking levels below the existing basecamp and Building E; (2) up to 336 spaces within four subterranean parking levels below Building D; and (3) up to 279 spaces within three subterranean levels below Building A. In addition, Alternative 2 would relocate the bicycle parking facility with bicycle parking spaces, restrooms, and showers to an area within the garage below basecamp.

As with the Project, Alternative 2 would create a variety of landscaped gathering areas to enhance the existing pedestrian environment internal to the Project Site, including a paseo, a central plaza area, courtyards, and roof gardens and terraces. These areas would include trees, accent paving, seating, and other landscaping features throughout the Project Site.

As with the Project, the timing of construction of specific elements of Alternative 2 would depend on the business needs at the time. In addition, construction of Alternative 2 could also occur in phases, with construction potentially commencing as late as 2024, if not before, and buildout completed by 2028. Similar to the Project, construction activities would include demolition of existing uses, grading and excavation, and construction of new structures and related infrastructure. Due to the additional level of subterranean parking to be provided as part of Alternative 2, the amount of soil export for Alternative 2 would increase from approximately 280,000 cubic yards to approximately 316,500 cubic yards. The haul route from the Project Site would be the same as for the Project and is anticipated to be via Sunset Boulevard to the Hollywood Freeway (US-101) to the east.

As with the Project, Alternative 2 would require a Major Development Project Conditional Use Permit for a Major Development Project; Conditional Use Permit to permit Floor Area Ratio Averaging in Unified Developments; a Commercial Corner Development Conditional Use Permit to permit a Commercial Corner Development; Site Plan Review; a Vesting Tentative Tract Map, and additional required discretionary and ministerial approvals and clearances enumerated in Section II, Project Description, of this Draft EIR.

## **2. Environmental Impacts**

### **a. Aesthetics**

As discussed in Section IV.A, Aesthetics, of this Draft EIR, the Project Site is identified by the City as being located within a transit priority area. In addition, the Project is an employment center project and is located on an infill site which meets Public Resources Code Section 21099's definition of an infill site as a lot located within an urban area that has been previously developed. The Project Site is also located within 0.5 mile from several bus lines, the majority of which provide a frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. Therefore, pursuant to Senate Bill 743 and Zoning Information File 2452, the Project's aesthetic impacts shall not be considered significant impacts on the environment. As such, the analysis included in Section IV.A, Aesthetics, of this Draft EIR, is provided for informational purposes only.

Alternative 2 would similarly meet the provisions of Senate Bill 743 as it would be developed within the same Project Site and with similar uses as the Project. As such, Alternative 2 would also be considered an employment center project located on an infill site within a transit priority area. Therefore, as with the Project, the following discussion regarding aesthetics is provided for informational purposes only.

## (1) Visual Character<sup>8</sup>

### (a) Construction

Similar to the Project, during construction activities for Alternative 2, the visual character and quality of the Project Site and adjacent roadways would be altered due to the removal of some of the existing structures; site preparation, grading, and excavation; the staging of construction equipment and materials; and the construction of building foundations and proposed structures. Similar to the Project, while some of the construction activities under Alternative 2 would occur within the internal, central portion of the Project Site, construction activities would also occur along Sunset Boulevard, Gordon Street, and Fountain Avenue. Therefore, some construction activities would be visible to pedestrians and motorists on these adjacent streets, as well as to viewers within nearby buildings. However, the appearance of the Project Site during construction would be typical of construction sites in urban areas. In addition, construction activities would be temporary in nature, and the visual impacts associated with construction activities would cease upon the completion of the construction phase of this alternative. Alternative 2 would also implement similar design features as the Project, including the installation of temporary construction fencing along the periphery of the Project Site to screen much of the construction activity from view at the street level, maintaining pedestrian walkways and construction fencing in a visually attractive manner, and shielding outdoor lighting used during construction.

As with the Project, construction of Alternative 2 would also require the removal of ornamental trees within the Project Site, some of which may be visible from the street. The removal of these trees could temporarily reduce the visual quality of the Project Site during the construction phase to the extent that the interior trees are visible from the public right-of-way. However, all existing trees to be removed within the Project Site would be replaced on at least a 1:1 basis in accordance with City requirements. While not anticipated, should any street trees be removed, street trees would be replaced on a 2:1 basis in accordance with City policy. In addition, as part of Alternative 2, ample on-site landscaping would be provided to enhance the streetscape, including a landscaped paseo, a central plaza area, courtyards, and rooftop gardens and terraces. As such, the removal of existing on-site trees during construction would not substantially or permanently alter or degrade the existing visual character of the Project Site or vicinity.

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<sup>8</sup> As previously noted, subsequent to the release of the Initial Study for the Project, the State CEQA Guidelines Appendix G threshold questions were revised. Prior to the release of the revised thresholds, the substantial degradation of the existing visual character or quality of a site and its surrounding was evaluated under aesthetics. The threshold has since been replaced by a new threshold question that considers whether a project would conflict with applicable zoning and other regulations governing scenic quality. However, as the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, stated that the Project's potential effects related to visual character and quality would be addressed in the EIR, this analysis is included for information purposes only.

Overall, while affecting the visual character of the Project Site and vicinity on a temporary basis, construction activities under Alternative 2 would not substantially and adversely alter or degrade the existing visual character or quality of the Project Site and surrounding area. Therefore, impacts related to visual character during construction of Alternative 2 would be less than significant, and similar to the less-than-significant impacts of the Project.

*(b) Operation*

As with the Project, Alternative 2 would visually alter the Project Site by removing several existing structures and constructing new studio-related creative office, production office/production support, storage, and soundstage buildings on the Project Site. Like the Project, Alternative 2 would require removal of some of the existing buildings on the Project Site. However, Alternative 2 would not require demolition of the United Recording Building located at 6050 Sunset Boulevard, which is considered a historic resource, but would instead relocate the United Recording Building to the interior of the Project Site. In addition, Buildings 38 and 42 proposed to be removed by the Project, and which are contributors to the potential historic district, would be retained as part of this alternative. Building 08/09 and Building 9 proposed to be removed by the Project would also be retained as part of the Preservation and Soundstage Alternative.

Alternative 2 would reduce the height of Building A by approximately 60 feet and would replace the six level parking structure proposed in the southeastern portion of the Project Site, at the corner of Gordon Street and Fountain Avenue with a three level soundstage/office building, thereby reducing the change in the existing visual character compared to the Project. In addition, Alternative 2 would increase the height of Building B by approximately 48 feet; however, this alternative would feature similar design elements as the Project that would be appropriate with the context of the surrounding uses. Overall, the extent to which this alternative would complement the surrounding uses in terms of the visual character would be greater compared to the Project due to the reduced height of Building A along Sunset Boulevard and the reduced height of the building proposed in the southeastern portion of the Project Site. Similar to the Project, this alternative would not substantially degrade the existing visual character or quality of the Project Site and its surroundings. Accordingly, impacts related to visual character under Alternative 2 would be less than significant. Such impacts would be less when compared to the less-than-significant impacts of the Project due to the retention of the United Recording Building and reduction in overall height of Building A proposed under Alternative 2.

## (2) Conflict with Applicable Regulations Governing Scenic Quality

As discussed in Section IV.A, Aesthetics, of this Draft EIR, a number of local plans, policies, and regulations related to scenic quality are applicable to the Project, including the

City of Los Angeles General Plan Framework Element and Conservation Element, the Community Plan, the Redevelopment Plan, the Citywide Urban Design Guidelines, the City of Los Angeles Walkability Checklist, and the LAMC. As described above, the Preservation and Soundstage Alternative would develop the Project Site similar to the Project as it relates to the development of Building A, Building B, and Building C. However, Alternative 2 would preserve the United Recording Building, located at 6050 Sunset Boulevard, by relocating the building to the interior of the Project Site. As detailed in Section IV.C, Cultural Resources, of this Draft EIR, the United Recording Building is a historic resource. In addition, the Preservation and Soundstage Alternative would involve the demolition of a portion of an existing parking structure on Gordon Street (Parking Structure C) to accommodate the development of two new soundstages and accessory office space (referred to as Building D). Alternative 2 would reallocate floor area proposed under the Project as part of Building A to the new soundstages and accessory office space (Building D). As such, Building A would be reduced in height by approximately three floors and approximately 60 feet. Overall, with the development of similar uses as the Project, Alternative 2 also would not conflict with the zoning and other regulations governing scenic quality detailed in Section IV.A, Aesthetics, of this Draft EIR. In addition, with the preservation of the United Recording Building, this alternative would support to a greater extent the primary objective and policy of the Conservation Element regarding the protection of cultural and historic resources. Thus, impacts would be less than significant. However, with the retention of the United Recording Building and the reduction in height of Building A, such impacts would be less than those of the Project.

## **b. Air Quality**

### **(1) Regional Emissions**

#### *(a) Construction*

As with the Project, construction of Alternative 2 has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from haul trucks and construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.B, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Alternative 2 would construct less total floor area as well as retain more buildings than the Project, which would result in fewer demolition activities and less overall building construction. In addition, Alternative 2 would include additional excavation and export associated with the additional level of subterranean parking compared to the Project. The additional excavation and export would increase the duration of these activities, but not the intensity of daily construction activity (i.e., the number of daily haul trips and equipment

required for excavation would not change). Taking into consideration the additional excavation and less overall building construction, the total construction duration would be reduced under Alternative 2. The construction phasing under Alternative 2 would also occur differently compared to the Project such that the overlap between different construction activities could occur. As detailed in Appendix B of this Draft EIR, maximum daily construction emissions would be similar compared to the Project. Alternative 2 would similarly exceed the regional air quality threshold for NO<sub>x</sub> emissions during overlap of construction activities. Exceedance of the regional air quality threshold for NO<sub>x</sub> emissions would occur on a similar number of days as the Project. However, the maximum daily NO<sub>x</sub> emissions under Alternative 2 would be approximately six percent less than the Project. Therefore, as with the Project, Alternative 2 would result in significant and unavoidable impacts associated with regional construction emissions, and impacts would be similar to those of the Project.

### *(b) Operation*

As with the Project, operational regional air pollutant emissions associated with Alternative 2 would be generated by vehicle trips to the Project Site, which are the largest contributors to operational air pollutant emissions, and the consumption of electricity and natural gas. While Alternative 2 would result in a reduction in the construction of new floor area, Alternative 2 would retain additional buildings as well as increase the area allocated to soundstages. As such, Alternative 2 would generate slightly more daily vehicle trips compared to the Project (4,155 daily vehicle trips under Alternative 2 and 4,110 daily trips for the Project). In addition, the change in land uses associated with Alternative 2 would also result in a slight increase in the daily VMT generated by these trips from 44,311 VMT to 44,477 VMT. Since the amount of vehicular emissions is based on the resultant daily VMT, the overall pollutant emissions generated by Alternative 2 would be slightly greater than the emissions generated by the Project. With the reduction in total new floor area compared to the Project, both area sources and stationary sources would generate less on-site operational air emissions than the Project. Therefore, under Alternative 2, total contributions to regional air pollutant emissions during operation would be similar to the Project's contribution. Thus, impacts to regional air quality under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

## **(2) Localized Emissions**

### *(a) Construction*

Alternative 2 would develop the Project Site similar to the Project and construct the proposed uses under Alternative 2 within the same footprint as the Project. The construction phasing under Alternative 2 would be different than the Project such that the overlap between different construction activities could occur. As detailed in Appendix B of this Draft EIR, like the Project, localized impacts under Alternative 2 would be less than

significant. Such impacts would be similar as the less-than-significant impacts of the Project.

*(b) Operation*

Localized operational impacts are determined primarily by peak-hour intersection traffic volumes. As summarized in Appendix J of this Draft EIR, the number of net new peak-hour trips generated by Alternative 2 would be reduced during the A.M. and P.M. peak hour. Specifically, peak-hour trips generated by Alternative 2 would be reduced during the A.M. peak hour from 492 trips generated by the Project to 481 trips and from 488 trips generated by the Project to 484 trips generated by Alternative 2 during the P.M. peak hour. As with the Project, Alternative 2 would not introduce any new major sources of air pollution within the Project Site. Because the localized impacts analysis from on-site operational activities and the localized CO hotspot analysis associated with off-site operational activities for the Project did not result in any significant impacts, localized impacts under Alternative 2 also would be less than significant and similar to the less-than-significant impacts of the Project.

**(3) Toxic Air Contaminants**

*(a) Construction*

As with the Project, construction of Alternative 2 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. Construction-related TAC emissions generated by Alternative 2 would be similar as those of the Project since overall construction activities would be similar compared to the Project. As with the Project, Alternative 2 would not result in a long-term source of TAC emissions given the short-term construction schedule. Thus, impacts due to TAC emissions under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

*(b) Operation*

As set forth in Section IV.B, Air Quality, of this Draft EIR, the primary sources of potential TACs associated with Project operations would include diesel particulate matter from delivery trucks. Under Alternative 2, the increase in the number of deliveries and associated diesel particulate matter emissions would be similar compared to the Project due to the slight reduction in total new floor area. Similar to the Project, the land uses proposed under Alternative 2 are not considered land uses that generate substantial TAC emissions. Therefore, Alternative 2 would not release substantial amounts of TACs, and impacts would be less than significant. Such impacts would be similar when compared to the less-than-significant impacts of the Project.



## **c. Cultural Resources**

### **(1) Historical Resources**

As discussed in Section IV.C, Cultural Resources, of this Draft EIR, the potential historic district consists of 35 buildings within the Sunset Gower Studios, 22 of which have been identified as contributors. The Project would demolish 15 buildings within the boundary of the potential historic district, including six buildings that are contributors to the potential historic district and nine buildings that are non-contributors. In comparison, Alternative 2 would require the demolition of 15 buildings within the boundary of the potential historic district, including five buildings that are contributors to the potential historic district and 10 buildings that are non-contributors. As detailed in the historical resources assessment prepared for the alternatives included in Appendix C of this Draft EIR, despite the loss of five contributing buildings, 17 contributing buildings would remain intact and in their original location after implementation of Alternative 2. As compared to the Project, Buildings 38 and 42 proposed to be removed by the Project, and which are contributors to the potential historic district, would be retained as part of this alternative. While not contributors to the potential historic district, Building 08/09 and Building 9 proposed to be removed by the Project would also be retained as part of the Preservation and Soundstage Alternative. In addition, the important configuration of buildings, spatial relationships and circulation patterns that are characteristic of the period of significance would also remain after implementation of the Alternative 2. As such, the proposed removal of contributing buildings to the potential historic district would not reduce the integrity of the potential historic district such that it can no longer convey its historic significance. Therefore, as with the Project, removal of contribution buildings caused by Alternative 2 would not result in significant impacts to historical resources (i.e., the potential historic district). In addition, Alternative 2 would implement similar mitigation measures as the Project to ensure the protection and proper maintenance of the potential historic district during and after implementation of Alternative 2.

With regard to individually eligible properties, Alternative 2 would retain and relocate the United Recording Building at 6050 Sunset Boulevard, which is one of three buildings on the Project Site that are eligible for historic listing as individual properties and which is proposed for removal by the Project. As such, Alternative 2 would avoid the Project's significant and unavoidable environmental impact related to the removal of the United Recorder Building.

Based on the above, impacts to historical resources under Alternative 2 would be less than significant and less than the significant and unavoidable impacts of the Project.

## (2) Archaeological Resources

As previously discussed, Alternative 2 would include an additional subterranean parking level under Buildings D and E and basecamp. As such, Alternative 2 would require additional excavation activities compared to the Project. However, given that the soils underlying the Project Site have been substantially disturbed through the process of historical development, encountering archaeological resources at depths below five to ten feet would be very unlikely. Thus, the potential for Alternative 2 to uncover archaeological resources would be similar when compared to the Project. As such, similar to the Project, Alternative 2 would implement a similar mitigation measure as the Project in order to mitigate potential impacts to archaeological resources. Therefore, impacts to archaeological resources under Alternative 2 would be less than significant with mitigation and similar to the impacts of the Project.

## (3) Human Remains

Alternative 2 would be implemented within the same Project Site as the Project. As discussed in Section IV.C, Cultural Resources, of this Draft EIR, the Project Site is located within an urbanized area and has been subject to previous grading and development. No known traditional burial sites have been identified on the Project Site. In addition, Alternative 2 would similarly comply with existing regulatory requirements in the event human remains were discovered during construction. Specifically, construction work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5, and disposition of the human remains and any associated grave goods would occur in accordance with Public Resources Code Section 5097.91 and 5097.98, as amended. Therefore, as with the Project, impacts related to human remains under Alternative 2 would be less than significant with implementation of regulatory requirements. In addition, although Alternative 2 would include additional excavation, given that the soils underlying the Project Site have been substantially disturbed through the process of historical development, encountering human remains at depths proposed by Alternative 2 would be very unlikely. As such, impacts would be similar compared to the Project's less-than-significant impacts. It is noted, however, that during the recent construction of Parking Structure C, which would be removed to allow construction of Building D, no resources were found.

## d. Energy

### (1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

#### *(a) Construction*

Similar to the Project, construction activities associated with Alternative 2 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. As with the Project, Alternative 2 would also generate a demand for transportation energy associated with on- and off-road vehicles. Like the Project, construction activities associated with Alternative 2 would not involve the consumption of natural gas. Taking into consideration of the additional excavation and less overall building construction, the total construction duration and energy consumed during construction of Alternative 2 would be less compared to the Project. As with the Project, the electricity demand during construction of Alternative 2 would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Construction equipment used during construction of Alternative 2 would also comply with Title 24 requirements where applicable, similar to the Project. With regard to transportation fuels, trucks and equipment used during construction of Alternative 2 would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. Therefore, as with the Project, construction activities would use energy that is not wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 2 and similar to the less-than-significant impacts of the Project.

#### *(b) Operation*

As with the Project, operation of Alternative 2 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions. The number of daily trips would increase under Alternative 2 compared to the Project. In addition, the change in land uses associated with Alternative 2 results in a slight increase in the daily VMT as compared to the Project. As such, the consumption of electricity, natural gas, and petroleum-based fuels would be slightly greater under Alternative 2. Similar to the Project, Alternative 2 would implement design features to reduce energy usage would exceed Title 24 energy requirements. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 2 would not be wasteful, inefficient, or unnecessary. Overall, impacts related to

energy use during operation of Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

## **(2) Conflict with Plans for Renewable Energy or Energy Efficiency**

As discussed in Section IV.D, Energy, of this Draft EIR, the current City of LA Green Building Code requires compliance with CalGreen and California's Building Energy Efficiency Standards (Title 24). Like the Project, Alternative 2 would comply with the City's Green Building Code, as well as be capable of achieving at least LEED® Silver equivalent status, which include conservation features to reduce natural gas usage. Therefore, similar to the Project, Alternative 2 would incorporate measures that are beyond current State and City energy conservation requirements. Also similar to the Project, Alternative 2 would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2019 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code. Therefore, as with the Project, Alternative 2 would not conflict with plans for renewable energy or energy efficiency. No impacts related to renewable energy or energy efficiency plans would occur under Alternative 2, and impacts would be similar to the less-than-significant impacts of the Project.

## **e. Geology and Soils (Paleontological Resources)**

As described above, Alternative 2 would construct up to four subterranean parking levels as compared to the three with the Project. Therefore, as with the Project, the possibility exists that paleontological artifacts that were not recovered during prior construction or other human activity may be present and construction of Alternative 2 could encounter such resources. It is noted that during the recent construction of Parking Structure C, no resources were found. Nevertheless, Alternative 2 would implement a similar mitigation measure as the Project in order to mitigate potential impacts to paleontological resources. Therefore, impacts to paleontological resources under Alternative 2 would be less than significant with implementation of mitigation. However, such potential impacts would be greater when compared to the Project's less-than-significant with mitigation impacts due to increased excavation.

## **f. Greenhouse Gas Emissions**

GHG emissions from a development project are determined in large part by the number of daily trips generated and energy consumption from proposed land uses. As previously discussed above, the number of daily trips generated by Alternative 2 would increase compared to the Project and the change in land uses associated with Alternative 2 would result in a slight increase in the daily VMT as compared to the Project. In addition, the amount of energy required by Alternative 2 would slightly increase compared to the

Project due to the change in land uses. Thus, the overall amount of GHG emissions generated by Alternative 2 would be anticipated to be similar to the amount of GHG emissions generated by the Project. As with the Project, Alternative 2 would be designed to comply with the requirements of the CALGreen Code and the Los Angeles Green Building Code. Alternative 2 would also incorporate design features to reduce GHG emissions and be capable of meeting the standards of LEED Silver or equivalent green building standards. With compliance with the CALGreen Code and the Los Angeles Green Building Code, and with the implementation of comparable sustainability features as the Project, Alternative 2 also would not conflict with any applicable plan, policy, regulation or recommendation to reduce GHG emissions. Thus, impacts related to GHG emissions under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

## **g. Land Use**

As previously described, the Preservation and Soundstage Alternative would develop similar uses as the Project. However, Alternative 2 would preserve the United Recording Building, located at 6050 Sunset Boulevard. As detailed in Section IV.C, Cultural Resources, of this Draft EIR, the United Recording Building is a historic resource. Alternative 2 would also reallocate floor area proposed under the Project as part of Building A to accommodate the development of two new soundstages and production support space (Building D and Building E). Due to the overall similarities in the development proposals of the Project and Alternative 2, the Preservation and Soundstage Alternative would similarly not conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Thus, impacts related to conflicts with land use plans under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

## **h. Noise**

### **(1) Noise**

#### *(a) Construction*

As previously discussed, while the amount of new building construction would be reduced due to the reduction in total development compared to the Project, Alternative 2 would include additional excavation and mat foundation construction compared to the Project. However, these types of construction activities would require similar pieces of construction equipment compared to the Project. As with the Project, construction of Alternative 2 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips.

Table 1 in Appendix G of this Draft EIR provides the estimated construction noise levels for various construction phases under Alternative 2 at the off-site noise-sensitive receptors. As indicated in Table 1 in Appendix G of this Draft EIR, noise levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Similar to the Project, there is potential for overlapping construction activities during Phase 1 and Phase 2 and during Phase 2 and Phase 3 construction. Table 2 in Appendix G of this Draft EIR provides the estimated noise levels due to overlapping construction activities under Alternative 2. Similar to the Project, noise impacts due to on-site construction activities under Alternative 2 would be significant at off-site receptors R1 and R2, prior to implementation of mitigation. Alternative 2 would comply with the same applicable regulatory requirements and implement similar design features and mitigation measures as the Project to reduce noise levels during construction. With implementation of the Project's mitigation measures, the construction noise levels at receptors R1 and R2 would be reduced by 15 dBA and 12 dBA, respectively, which would reduce the noise impacts at receptor R2 to less than significant. However, noise impacts at receptor R1 would still exceed the significance threshold by 2.5 dBA with mitigation measures and impacts would remain significant.

Table 3 in Appendix G of this Draft EIR presents the estimated noise levels due to off-site construction related traffic (construction trucks and worker vehicles). Similar to the Project, the noise levels generated by construction traffic would be below the significance threshold along Sunset Boulevard. However, the estimated noise from construction trucks under Alternative 2 would exceed the 5-dBA significance criteria along Gordon Street by up to 6.9 dBA during the grading and mat construction phases, as compared to the maximum noise exceedance of 7.3 dBA under the Project. Table 4 in Appendix G of this Draft EIR provides the off-site construction-related traffic noise levels associated with overlapping construction activities. Similar to the Project, the construction-related traffic with overlapping construction activities would be below the significance threshold along Sunset Boulevard. However, the significance threshold would be exceeded by up to 7.5 dBA along Gordon Street under Alternative 2, as compared to the maximum noise exceedance of 7.9 dBA under the Project. Therefore, the off-site construction-related traffic noise impacts under Alternative 2 would be less than the Project.

In summary, on-site and off-site construction noise impacts under Alternative 2 would continue to be significant and unavoidable and would be similar to the significant and unavoidable impacts of the Project. Overall, construction-related noise impacts under Alternative 2 would be similar to those of the Project.

#### *(b) Operation*

As discussed in Section IV.G, Noise, of this Draft EIR, sources of operational noise under the Project include (a) on-site stationary noise sources, such as outdoor mechanical

equipment, activities within the proposed outdoor spaces, parking facilities, loading dock, and trash compactor; and (b) off-site mobile (roadway traffic) noise sources.

Alternative 2 would introduce noise from similar on-site and off-site noise sources as the Project. Alternative 2 would include Buildings A and B in a similar location as the Project as well as additional buildings (Buildings D and E). Alternative 2 would also include outdoor spaces, loading dock, and trash compactor in similar areas as the Project. As compared to the Project, Building A would have fewer floors and outdoor terraces. There would be no above-grade parking under Alternative 2, as compared to the Project. Therefore, the noise levels from outdoor building mechanical equipment, outdoor spaces, loading dock, and trash compactor would be similar to the Project. In addition, similar to the Project, on-site mechanical equipment used during operation of Alternative 2 would comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. Thus, operational on-site noise impacts would be less than significant and similar to the less-than-significant impacts of the Project.

Table 5 in Appendix G of this Draft EIR presents the estimated noise levels at the off-site receptor locations from operation of the mechanical equipment under Alternative 2. As indicated in therein, the estimated noise levels from the mechanical equipment would be below the significance threshold of 5 dBA ( $L_{eq}$ ) above ambient noise levels, similar to the Project. Therefore, noise impacts from mechanical equipment under Alternative 2 would be less than significant.

Table 6 in Appendix G of this Draft EIR presents the anticipated number of people at each of the outdoor spaces and the Project's maximum amplified sound levels. Table 7 in Appendix G of this Draft EIR presents the estimated noise levels at the off-site sensitive receptors resulting from the use of outdoor areas. Similar to the Project, the estimated noise levels from the outdoor spaces would be below the significance criteria of 5 dBA ( $L_{eq}$ ) above ambient noise levels. Therefore, noise impacts from outdoor areas under Alternative 2 would be less than significant.

Similar to the Project, Alternative 2 would include a loading/recycling area at the south end of Building A. The loading/recycling area would be shielded to the off-site sensitive receptors by the existing and proposed buildings. Table 8 in Appendix G of this Draft EIR presents the estimated noise levels at the off-site receptor locations from operation of the loading dock and trash compactor under Alternative 2. Similar to the Project, the estimated noise levels from the loading dock and trash compactor at all off-site receptor locations would be below the significance criteria of 5 dBA ( $L_{eq}$ ) above ambient noise levels. Therefore, noise impacts from loading dock and trash compactor operations under Alternative 2 would be less than significant.

With regard to off-site noise sources, Alternative 2 would result in a modest increase in daily vehicle trips compared to the Project. As shown in Table 9 in Appendix G of this Draft EIR, Alternative 2 would result in a maximum of a 2.2 dBA (CNEL) increase in traffic noise along the roadway segment Gordon Street (between Sunset Boulevard and Fountain Avenue), as compared to the maximum increase of 1.9 dBA (CNEL) under the Project. At other analyzed roadway segments, the increase in traffic-related noise levels would be less than 0.5 dBA. Similar to the Project, the increase in traffic noise levels would be below the relevant 3 dBA CNEL significance criteria. Therefore, traffic noise impacts under Future Plus Project conditions under Alternative 2 would be less than significant.

Table 10 in Appendix G of this Draft EIR presents the off-site traffic noise impacts as compared with the existing conditions. When compared with existing conditions, the off-site traffic noise under Alternative 2 would result in a maximum of a 2.1 dBA (CNEL) increase in traffic noise along the roadway segment Gordon Street (between Sunset Boulevard and Fountain Avenue), as compared to the maximum increase of 1.8 dBA (CNEL) under the Project. At other analyzed roadway segments, the increase in traffic-related noise levels would be 0.4 dBA or lower. Similar to the Project, the estimated increase in traffic noise levels as compared to existing conditions would be below the relevant 3 dBA CNEL significance criteria. Therefore, traffic noise impacts under Existing Plus Project conditions would be less than significant. As analyzed above, off-site noise impacts under Alternative 2 would be greater than those of the Project due to the increase in vehicle trips. However, off-site related noise impacts would continue to be less than significant.

Similar to the Project, a composite noise analysis, which includes all Project-related on-site noise sources (e.g., mechanical equipment, outdoor areas, parking facilities, loading dock and trash compactor) and off-site traffic, was analyzed at the off-site sensitive receptor locations. Table 11 in Appendix G of this Draft EIR presents the estimated composite noise levels at the off-site sensitive receptor locations from the noise sources under Alternative 2. As indicated therein, Alternative 2 would result in maximum increases in composite noise levels of 2.3 dBA at receptor location R5, as compared to the maximum increase of 1.5 dBA at receptor location R5 under the Project. Similar to the Project, the composite noise levels from Alternative 2's operation at the off-site receptor locations would be below the 3-dBA significance criteria (applicable to receptor locations R4 and R5) as the composite (Alternative 2 plus ambient) noise level falls within the normally unacceptable (70 to 75 CNEL) and clearly unacceptable (greater than 75 CNEL) land use categories and the 5-dBA significance criteria (applicable to receptor locations R1, R2 and R3) as the composite noise levels fall within the conditionally acceptable (60 to 70 CNEL) land use category. The composite noise level impacts under Alternative 2 would be slightly higher than the Project; however, noise impacts would continue to be less than significant.



## (2) Vibration

As noted above, while the amount of new building construction would be reduced due to the reduction in total development compared to the Project, Alternative 2 would include additional excavation and mat foundation construction compared to the Project. As with the Project, construction of Alternative 2 would generate vibration from the use of heavy-duty construction equipment as well as from truck trips. While the overall amount of building construction would be reduced, excavation and mat foundation construction activities would increase compared to the Project. Since, construction vibration impacts are evaluated based on the maximum peak vibration levels generated by each type of construction equipment, on- and off-site construction activities and the associated construction vibration levels would be expected to be similar to those of the Project during maximum (peak) activity days. As such, vibration levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Alternative 2 would also implement similar design features and mitigation as the Project to reduce on-site vibration levels. As such, vibration impacts due to on- and off-site construction activities under Alternative 2 would similarly be less than significant with mitigation for on-site construction vibration (building damage), significant and unavoidable for on-site construction vibration (human annoyance), and less than significant for off-site construction vibration (with respect to both building damage and human annoyance). Overall, vibration impacts under Alternative 2 would be similar to the impacts of the Project.

## i. Public Services

### (1) Fire Protection

#### *(a) Construction*

As with the Project, construction activities under Alternative 2 would have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, exposed electrical lines, chemical reactions, and lighted cigarettes. As with the Project, construction activities under Alternative 2 would comply with the safety and health provisions of OSHA. Construction would also occur in compliance with all applicable federal, State, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials.

Like the Project, construction activities associated with Alternative 2 also would generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. These short-term and temporary construction activities could similarly temporarily affect emergency response for emergency vehicles along Sunset Boulevard and other main connectors due to traffic during the construction phase. However, as with the Project, the

construction of Alternative 2 would not require the closure of any vehicle travel lanes as the majority of construction activities would take place within the Sunset Gower Studios campus. In addition, as with the Project, a Construction Management Plan would also be implemented as part of Alternative 2 to ensure that adequate and safe access remains available within and near the Project Site during construction activities. This alternative would also ensure that travel lanes would continue to be maintained in each direction throughout the construction period, and the scheduling of haul truck and construction worker trips outside weekday peak traffic periods to the extent feasible would lessen any potential impact. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent right-of-ways, as well as on the City-designated disaster routes along Hollywood Boulevard, Sunset Boulevard, and Vine Street. Overall, construction-related impacts related to fire protection services under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project due to the increased construction activities.

#### *(b) Operation*

As previously discussed, Alternative 2 would construct similar uses as the Project and would not include any residential uses. Therefore, Alternative 2 would not generate a new residential population in the service area of Fire Station No. 82 that would demand fire protection services provided by the LAFD. Thus, this alternative would generate a similar demand for LAFD fire protection services on a daily basis when compared to the Project. Similar to the Project, Alternative 2 would implement all applicable Building Code and Los Angeles Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Therefore, as with the Project, compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection, would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment. Alternative 2 would also include the installation of automatic fire sprinklers within the proposed building. Furthermore, like the Project, traffic generated by Alternative 2 would not significantly impact emergency vehicle response to the Project Site and surrounding area as the drivers of emergency vehicles have the ability to bypass traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. The driveways and internal circulation under Alternative 2 would also be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. As with the Project, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for Alternative 2. Therefore, similar to the Project, this alternative would not necessitate the construction of new fire protection facilities, the construction of which would cause significant environmental impacts, in order to maintain service. As such, impacts with regard to fire protection

services during operation of Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

## (2) Police Protection

### *(a) Construction*

Similar to the Project, construction activities associated with Alternative 2 would not be expected to generate a permanent residential population that would substantially increase the police service population of the Hollywood Area. Specifically, 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 Project. As such, Alternative 2 would not generate a new residential population on the Project Site or in the area during construction, which would result in the need for additional police protection services.

As discussed in Section IV.H.2, Public Services—Police Protection, of this Draft EIR, construction activities could also potentially affect LAPD response to the Project Site and surrounding area. However, as discussed in Section IV.I, Transportation, of this Draft EIR, given the permitted hours of construction and nature of construction projects, most, if not all, of the construction worker and haul truck trips would occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts. Also, similar to the Project, Alternative 2 would implement a Construction Management Plan during construction to ensure that adequate and safe access is available within and near the Project Site during construction activities. Furthermore, construction-related traffic generated by the Project would not significantly impact LAPD response in the vicinity of the Project Site as emergency vehicles have the ability to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Based on the above, similar to the Project, Alternative 2 would not necessitate the provision of new or physically altered police facilities in order to maintain the LAPD's capability to serve the Project Site. Therefore, construction-related impacts to police protection services under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project due to the increased construction activities.

### *(b) Operation*

Similar to the Project, Alternative 2 would construct new studio-related creative office, production office/production support, storage, and soundstage buildings on the Project Site and would not include any residential uses. As discussed previously, this alternative would generate a net increase of approximately 1,959 employees compared to

the Project's 1,869 employees. Thus, Alternative 2 would generate a higher employee population on the Project Site compared to the Project. Accordingly, the increase in the existing police service population for the Hollywood Community Police Station generated by Alternative 2 would increase compared to the Project. However, as with the Project, Alternative 2 would similarly not cause a significant change to the current officer-to-resident ratio for the Hollywood Area as no residential uses are proposed. Thus, as with the Project, Alternative 2 would not result in the need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts, in order to maintain service. Therefore, impacts on police protection services would be less than significant and similar to the less-than-significant impacts of the Project.

## **j. Transportation**

As previously described, the Preservation and Soundstage Alternative would be developed within the same Project Site as the Project. As such, the plans, policies, and programs applicable to the Project would also apply to Alternative 2. As discussed above, Alternative 2 would feature similar vehicular, pedestrian, and bicycle access as the Project. In addition, parking would generally be provided similar to the Project with the exception of the bicycle parking facility, which would be relocated to an area below basecamp, and the parking structure proposed at the corner of Gordon Street and Fountain Avenue, which would be eliminated under this Alternative. Overall, as with the Project, Alternative 2 would be consistent with the goals, policies, and requirements of the applicable plans. Specifically, consistent with the Mobility Plan, LAMC Section 12.37, and Vision Zero, Alternative 2 would not require any dedications or improvements along the streets adjacent to the Project Site perimeter. Similar to the Project, Alternative 2 would also promote pedestrian activity and reduce vehicle trips and VMT by encouraging the use of alternative modes of transportation; providing convenient and adequate bicycling facilities; and enhancing pedestrian amenities through the provision of roof gardens and terraces, courtyards, paseos, and walkways, which would include accent paving, seating, and other landscape elements. As such, Alternative 2 would comply with the programs and policies set forth in the Mobility Plan, Plan for a Healthy Los Angeles, LAMC Section 12.21.A.16 and LAMC Section 12.26J, Citywide Design Guidelines, the Walkability Checklist, LADOT's Transportation Technology Strategy and Design Standards, SGAG RTP/SCS, Hollywood Community Plan, and the Redevelopment Plan to the same extent as the Project. Therefore, Alternative 2 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Thus, impacts would be similar to the less-than-significant impacts of the Project.

With respect to VMT, Alternative 2 does not include residential uses and would not result in any household VMT per capita. Prior to implementation of any project design features or mitigation measures, the proposed uses would result in 25,024 total work VMT (a less than two percent increase when compared to the Project), which equates to an

average work VMT per employee of 6.2 like the Project.<sup>9</sup> As such, similar to the Project, the work VMT per employee for Alternative 2 would still fall below the significance threshold for the Central APC of 7.6.<sup>10</sup> Therefore, impacts with respect to conflicts with CEQA Guidelines Section 15064.3, subdivision (b) would be similar to the less-than-significant impacts of the Project.

As with the Project, Alternative 2 would not introduce hazardous design features, so like the Project, no impact would occur. Lastly, similar to the Project, Alternative 2 would not interfere with emergency access; therefore, impacts would be less than significant.

## **k. Tribal Cultural Resources**

As previously discussed, Alternative 2 would include an additional subterranean parking level and would include construction in other areas of the Project Site not proposed by the Project. However, as discussed in Section IV.J, Tribal Cultural Resources, of this Draft EIR, no known recorded tribal cultural resources have been identified within the Project Site or in the immediate vicinity of the Project Site. In addition, it is noted that during the recent construction of Parking Structure C, no resources were found. As such, like the Project, no impacts to tribal cultural resources would occur under Alternative 2, and such impacts would be similar to the impacts of the Project.

## **l. Utilities and Service Systems**

### **(1) Water Supply**

#### *(a) Construction*

Similar to the Project, construction activities associated with Alternative 2 would result in a temporary demand for water associated with dust control, equipment and site cleanup, excavation and export, soil compaction and earthwork, mixing and placement of concrete, irrigation for plant and landscaping establishment, testing of water connections and flushing, and other short-term related activities. This demand would be anticipated to be similar to that of the Project. While the amount of total new floor area would be reduced under Alternative 2, construction would include additional areas of excavation that may require watering for dust control. As evaluated in Section IV.K.1, Utilities and Service

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<sup>9</sup> Gibson Transportation Consulting, Inc., "Vehicle Miles Traveled Analysis of Project Alternatives for the Sunset Gower Studios Preservation and Enhancement Plan Hollywood, California," February 13, 2020. See Appendix J of this Draft EIR.

<sup>10</sup> Gibson Transportation Consulting, Inc., "Vehicle Miles Traveled Analysis of Project Alternatives for the Sunset Gower Studios Preservation and Enhancement Plan Hollywood, California," February 13, 2020. See Appendix J of this Draft EIR.

Systems—Water Supply and Infrastructure, of this Draft EIR, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of Project construction. Since the water demand for construction activities under Alternative 2 would be similar to that of the Project, the temporary and intermittent demand for water during construction under Alternative 2 would also be expected to be met by the City's available water supplies. Similarly, the existing LADWP water infrastructure would be adequate to provide the water flow necessary to serve Alternative 2. Therefore, impacts on water supply and infrastructure associated with construction activities would be less than significant under Alternative 2 and similar to the less-than-significant impacts of the Project.

### *(b) Operation*

As with the Project, operation of Alternative 2 would generate an increased demand for water relative to existing conditions. As described above, Alternative 2 would develop a total of 619,942 square feet of floor area (a reduction of 8,015 square feet of floor area compared to the Project's proposed 627,957 square feet of floor area). Therefore, given the slight reduction in floor area and the development of similar uses as the Project, it is anticipated that Alternative 2 would generate a similar demand for water as the Project. In addition, Alternative 2 would implement similar water conservation features as the Project to reduce water demand. Therefore, the water demand under Alternative 2 would also be expected to be within the available and projected water supplies for LADWP under normal, single-dry, and multi-dry years through the year 2040. In addition, as with the Project, Alternative 2 would connect to the existing mains within the surrounding streets.

As Alternative 2 would require similar fire flow requirements pursuant to the LAMC as the Project, it is assumed that sufficient infrastructure capacity would be available to provide fire water service to Alternative 2 and upgrades to the mainlines that serve the Project Site would not be required. Thus, operational impacts to water supply and infrastructure under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

## **(2) Wastewater**

### *(a) Construction*

Similar to the Project, construction activities for Alternative 2 would result in wastewater generation from construction workers on-site. However, portable restrooms and hand wash areas would be provided during construction, which would not contribute to wastewater flows to the City's wastewater system. Thus, wastewater generation from construction activities under Alternative 2 would not cause a measurable increase in wastewater flows.

As with the Project, Alternative 2 would not require or result in the construction of new wastewater treatment facilities or in the expansion of existing facilities. Like the Project, Alternative 2 would require construction activities associated with connecting on-site wastewater lines to the sewer mains adjacent to the Project Site in order to provide wastewater services to the proposed buildings. These construction activities would primarily be confined to trenching and would be limited to the on-site wastewater distribution as well as minor off-site work associated with connections to the public main. Therefore, construction-related impacts to the wastewater system under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

*(b) Operation*

As with the Project, operation of Alternative 2 would generate greater wastewater flows relative to existing conditions. As described above, Alternative 2 would develop a total of 619,942 square feet of floor area (a reduction of 8,015 square feet of floor area compared to the Project's proposed 627,957 square feet of floor area). Therefore, given the slight reduction in total floor area and the development of similar uses as the Project, Alternative 2 would result in a wastewater generation similar to that of the Project. Thus, it can be reasonably concluded that the wastewater generated by Alternative 2 would also be accommodated by the existing capacity of any wastewater treatment plant, including the Hyperion Water Reclamation Plant, and impacts with respect to treatment capacity would be less than significant.

Similar to the Project, sewer service for Alternative 2 would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site. Given that wastewater flows generated by Alternative 2 would be similar to the Project, it is anticipated that there would be sufficient capacity within the sewer lines serving the Project Site to accommodate the flows from Alternative 2. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for Alternative 2 during the permitting process. In addition, sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Thus, operational impacts with regard to wastewater generation and infrastructure capacity under Alternative 2 would be less than significant and similar when compared to the less-than-significant impacts of the Project.

### (3) Energy and Telecommunications Infrastructure

#### *(a) Energy Infrastructure*

##### *(i) Construction*

As discussed above, the overall amount of energy needed for construction activities associated with Alternative 2 would be expected to be similar to that of the Project. Specifically, while total new floor area would be reduced under Alternative 2, this alternative would require construction in other areas of the Project Site not proposed by the Project as well as additional excavation activities. As discussed in Section IV.K.3, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR, the estimated energy usage of the Project during construction would be within the available capacity and supply of the existing infrastructure. Since Alternative 2 would generate a similar demand for energy during construction as the Project, the energy demand of Alternative 2 would similarly be within the available capacity of the existing infrastructure. Therefore, impacts to energy infrastructure capacity during construction would be less than significant and similar to the less-than-significant impacts of the Project.

##### *(ii) Operation*

As previously discussed, while Alternative 2 would result in a reduction in total new floor area compared to the Project, the number of daily trips would increase under Alternative 2 compared to the Project. As such, while the consumption of electricity and natural gas would be reduced under Alternative 2, the consumption of petroleum-based fuels would increase. Therefore, the overall total energy consumption of Alternative 2 would be anticipated to be similar to that of the Project. Therefore, as with the Project, the existing energy infrastructure would similarly have capacity to support Alternative 2, and the Project would not require the expansion of the existing main infrastructure or require relocation of the infrastructure. Impacts related to energy infrastructure would be less than significant under Alternative 2 and similar to the less-than-significant impacts of the Project.

#### *(b) Telecommunications Infrastructure*

With regard to telecommunication facilities, similar to the Project, Alternative 2 would require construction of new on-site telecommunications infrastructure to serve new buildings and potential upgrades and/or relocation of existing telecommunications infrastructure. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. However, as with the Project, a Construction Management Plan would be implemented during construction of Alternative 2 to ensure safe pedestrian access and vehicle travel throughout the construction period. In addition, when considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration (i.e., months) and would cease to occur when installation is



complete. Installation of new telecommunications infrastructure would primarily take place on-site, with minor off-site work associated with connections to the public system. As with the Project, no upgrades to off-site telecommunications systems are anticipated. In addition, any work that may affect services to the existing telecommunications lines would be coordinated with service providers. Thus, as with the Project, impacts related to telecommunications infrastructure would be less than significant under Alternative 2 and similar to the less-than-significant impacts of the Project.

### **3. Comparison of Impacts**

As analyzed above, Alternative 2 would eliminate the Project's significant and unavoidable impact to historical resources. The Project's significant and unavoidable impacts related to regional air quality emissions during construction, on-site construction noise, off-site construction noise, and vibration from on-site construction with respect to human annoyance would remain with development of Alternative 2. The Project's significant and unavoidable cumulative impacts related to regional air quality emissions during construction and off-site construction noise would also remain with development of Alternative 2. In addition, while impacts on paleontological resources would remain less than significant with mitigation, such impacts would be greater when compared to the Project given the increase in grading and excavation activities. The remaining impacts would be similar to, or less than, those of the Project.

### **4. Relationship of the Alternative to Project Objectives**

With a similar mix of uses as the Project, Alternative 2 would also meet the underlying purpose of the Project to provide television, video, and motion picture production facilities, while supporting the evolving needs of the entertainment industry for compatible office space, enhanced post-production facilities, and other studio-related facilities. In addition, Alternative 2 would achieve the following Project objectives:

- Consistent with the objective of the Hollywood Community Plan to further the development of Hollywood as a major center of entertainment and to perpetuate its image as the international center of the motion picture industry, substantially enhance the existing studio/media-related office and office production uses within an existing studio campus to ensure continued viability of the studios.
- In support of the objective of the Hollywood Community Plan to promote economic well-being and public convenience through encouraging the revitalization of the motion picture industry, create a secure campus environment where media and entertainment related uses are consolidated with production,

post-production, and administrative offices in order to maximize creativity and productivity.

- Consistent with the objective of the General Plan to maintain significant historic and architectural resources and districts while allowing for the development of economically viable uses, establish clear guidelines for the preservation of the historic character of the Project Site while providing an upgraded office space and production-supporting uses on the Project Site in a manner that respects and preserves the majority of identified historic resources and districts.
- Enhance an existing studio site along a transit corridor and within a high activity area where media and entertainment related uses are consolidated with production, post-production, and administrative offices in one site to promote sustainability and reduces vehicle miles traveled, with associated reductions in air quality and greenhouse gas emissions.
- Design and construct economically-viable and new state-of-the-art and technologically advanced creative office and production support spaces with the integrated density, infrastructure, parking, and technology to attract high-quality media and creative office tenants to a key corridor in Hollywood and to meet the existing and anticipated future demand of the movie, television, and entertainment industry and to allow flexibility to incorporate future technology advances.
- Provide an enhanced studio campus environment that creates new media-related employment opportunities serving movie, television, and entertainment industries, as well as construction jobs, providing opportunities for local and regional economic growth for a rapidly growing neighborhood residential population and locate jobs on a site that is easily accessible through public transportation.
- 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.
- Provide adequate and safe parking that satisfies the unique demand of the entertainment industry with direct access to the proposed uses, including truck circulation and maintenance of the production “basecamp” to allow for the flexible and efficient staging of trucks and trailers needed for film and television productions, and to enhance efficiency and safety.

## **V. Alternatives**

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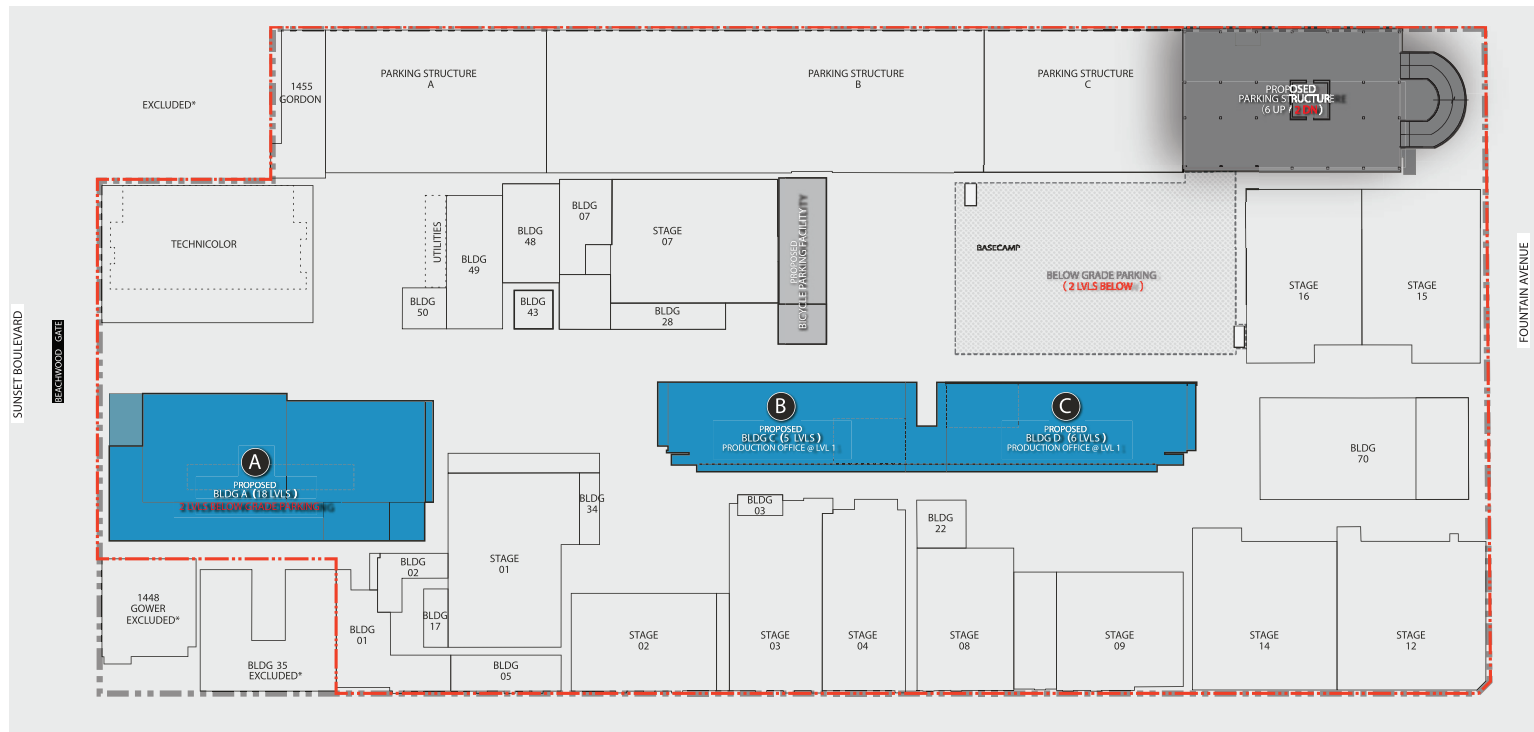
### **C. Alternative 3: Reduced Excavation Alternative**

#### **1. Description of the Alternative**

Alternative 3, the Reduced Excavation Alternative, would eliminate the third level of subterranean parking under Building A and Basecamp proposed by the Project. In addition, the number of parking spaces in the subterranean parking levels below Basecamp would be reduced. In total, Alternative 3 would reduce the number of new parking spaces provided as part of the Project by approximately 550 spaces. The remaining Project components would remain as proposed by the Project. A conceptual site plan for Alternative 3 is provided in Figure V-2 on page V-51.

As shown in Figure V-2, as with the Project, Alternative 3 would develop three new buildings comprising 627,957 square feet of floor area, including 478,851 square feet of creative office space within Building A, 68,638 square feet of creative office and production support space within Building B, 79,018 square feet of creative office and production support space within Building C, and 1,450 square feet for a bicycle parking facility. As with the Project, Alternative 3 would remove 160,611 square feet of existing floor area, resulting in a net increase of approximately 467,346 square feet of floor area. Like the Project, Building A under Alternative 3 would be 18 stories with a height of 300 feet, Building B would be five stories with a height of approximately 89 feet, and Building C would be six stories with a height of approximately 89 feet. The overall design of the buildings under Alternative 3, including architectural features, lighting and signage, and sustainability, would be similar to that of the Project. Similarly, Alternative 3 would feature similar vehicular, pedestrian, and bicycle access as the Project.

As with the Project, Alternative 3 would create a variety of landscaped gathering areas to enhance the existing pedestrian environment internal to the Project Site, including a paseo, a central plaza area, courtyards, and roof gardens and terraces. These areas would include trees, accent paving, seating, and other landscaping features throughout the Project Site. Similar to the Project, construction of Alternative 3 could be developed in multiple phases. However, as Alternative 3 would remove one level of subterranean parking under both Building A and Basecamp, Alternative 3 would result in a reduction in excavation and export compared to the Project. As such, construction activities and the construction period would be reduced compared to the Project.



**Figure V-2**  
Alternative 3 Conceptual Site Plan

As with the Project, Alternative 3 would require a Conditional Use Permit for a Major Development Project; Conditional Use Permit to permit Floor Area Ratio Averaging in Unified Developments; Conditional Use Permit to permit a Commercial Corner Development; Vesting Tentative Tract Map; Site Plan Review; Haul Route approval; and demolition, grading, excavation, foundation, and associated building permits as required.

## **2. Environmental Impacts**

### **a. Aesthetics**

As discussed in Section IV.A, Aesthetics, of this Draft EIR, the Project Site is identified by the City as within a transit priority area. In addition, the Project is an employment center project and is located on an infill site which meets Public Resources Code Section 21099's definition of an infill site as a lot located within an urban area that has been previously developed. The Project Site is also located within 0.5 mile from several bus lines, the majority of which provide a frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. Therefore, pursuant to Senate Bill 743 and Zoning Information File 2452, the Project's aesthetic impacts shall not be considered significant impacts on the environment. As such, the analysis included in Section IV.A, Aesthetics, of this Draft EIR, is provided for informational purposes only.

Alternative 3 would similarly meet the provisions of Senate Bill 743 as it would be developed within the same Project Site and with similar uses as the Project. As such, Alternative 3 would also be considered an employment center project located on an infill site within a transit priority area. Therefore, as with the Project, the following discussion regarding aesthetics is provided for informational purposes only.

## (1) Visual Character<sup>11</sup>

### (a) Construction

Similar to the Project, during construction of Alternative 3, the visual character and quality of the Project Site and adjacent roadways would be altered due to the removal of some of the existing structures; site preparation, grading, and excavation; the staging of construction equipment and materials; and the construction of building foundations and proposed structures. Similar to the Project, while some of the construction activities under Alternative 3 would occur within the internal, central portion of the Project Site, construction activities would also occur along Sunset Boulevard, Gordon Street, and Fountain Avenue. Therefore, some construction activities would be visible to pedestrians and motorists on these adjacent streets, as well as to viewers within nearby buildings. However, the appearance of the Project Site during construction would be typical of construction sites in urban areas. In addition, construction activities would be temporary in nature, and the visual impacts associated with construction activities would cease upon the completion of the construction phase of this alternative. Alternative 3 would also implement similar design features as the Project, including the installation of temporary construction fencing to screen much of the construction activity from view at the street level, maintaining pedestrian walkways and construction fencing in a visually attractive manner, and shielding outdoor lighting used during construction.

As with the Project, construction of Alternative 3 would also require the removal of ornamental trees within the Project Site, some of which may be visible from the street. The removal of these trees could temporarily reduce the visual quality of the Project Site during the construction phase to the extent that the interior trees are visible from the public right-of-way. However, all existing trees to be removed within the Project Site would be replaced on at least a 1:1 basis in accordance with City requirements. While not anticipated, should any street trees be removed, street trees would be replaced on a 2:1 basis in accordance with City policy. In addition, as part of Alternative 3, ample on-site landscaping would be provided to enhance the streetscape, including a landscaped paseo, a central plaza area, courtyards, and rooftop gardens and terraces. As such, the removal of existing on-site trees during construction would not substantially or permanently alter or degrade the existing visual character of the Project Site or vicinity.

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<sup>11</sup> As previously noted, subsequent to the release of the Initial Study for the Project, the State CEQA Guidelines Appendix G threshold questions were revised. Prior to the release of the revised thresholds, the substantial degradation of the existing visual character or quality of a site and its surrounding was evaluated under aesthetics. The threshold has since been replaced by a new threshold question that considers whether a project would conflict with applicable zoning and other regulations governing scenic quality. However, as the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, stated that the Project's potential effects related to visual character and quality would be addressed in the EIR, this analysis is included for information purposes only.

Overall, while affecting the visual character of the Project Site and vicinity on a temporary basis, construction activities under Alternative 3 would not substantially and adversely alter or degrade the existing visual character or quality of the Project Site and surrounding area. Based on the above, impacts related to visual character during construction of Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduced construction activities and duration.

*(b) Operation*

Due to the similarities in the proposed development between the Project and Alternative 3, the effects to visual character and quality associated with Alternative 3 would be the same as those of the Project. As discussed in Section IV.A, Aesthetics, of this Draft EIR, the Project would remove 21 buildings and would introduce three new buildings, a parking structure, and a bicycle parking facility. These same changes to the Project Site are proposed by Alternative 3. In addition, Alternative 3 also proposes removal of the existing United Recording Building located at 6050 Sunset Boulevard, which is considered a historic resource. However, as evaluated in Section IV.A, Aesthetics, of this Draft EIR, the architecture of the United Recording Building does not contribute to the visual character or quality of the Project Site and surroundings. Accordingly, the demolition of the 6050 Sunset Boulevard building would not result in the loss of a unique visual resource and would not substantially degrade the visual character or quality of the Project Site and its surroundings. Additionally, as with the Project, the buildings proposed by Alternative 3 would be designed in a contemporary architectural style that would feature compatible massing, heights, and design elements that would be appropriate with the context of the surrounding uses. Overall, as with the Project, relative to the surrounding development, Alternative 3 would complement the varying design elements of both the commercial and residential uses adjacent to the Project Site and would allow for the integration of the Project Site, providing a visually unified space while modernizing and improving the functionality of the studio. Therefore, as with the Project, Alternative 3 would not substantially degrade the existing visual character or quality of the Project Site and its surroundings. Impacts to visual character would be less than significant and similar to the less-than-significant impacts of the Project.

## (2) Conflict with Applicable Regulations Governing Scenic Quality

As described above, Alternative 3 would develop the Project Site similar to the Project. Therefore, with the development of similar uses as the Project, Alternative 3 also would not conflict with the zoning and other regulations governing scenic quality. Thus, impacts would be less than significant, and such impacts would be similar to those of the Project.

## **b. Air Quality**

### **(1) Regional Emissions**

#### *(a) Construction*

As with the Project, construction of Alternative 3 has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.B, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Under Alternative 3, construction activities would be reduced in comparison to the Project due to the reduction in excavation activities. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, similar to the Project, Alternative 3 would exceed the regional air quality threshold for NO<sub>x</sub> emissions. Therefore, while the reduction in excavation activities would reduce impacts associated with regional construction emissions as compared to the Project, impacts would remain significant and unavoidable.

#### *(b) Operation*

As with the Project, operational regional air pollutant emissions associated with Alternative 3 would be generated by vehicle trips to the Project Site, which are the largest contributors to operational air pollutant emissions, and the consumption of electricity and natural gas. As previously discussed, Alternative 3 would only eliminate one level of subterranean parking compared to the Project, while still adding the same number of buildings and floor area as the Project. As such, the number of net new daily vehicle trips generated by Alternative 3 would be the same as the net new daily vehicle trips generated by the Project. Since the amount of vehicular emissions is based on the number of trips generated, the overall pollutant emissions generated by Alternative 3 would be similar to the emissions generated by the Project. In addition, both area sources and stationary sources would also generate on-site operational air emissions similar to the Project. Therefore, under Alternative 3, total contributions to regional air pollutant emissions during operation would be similar to the Project's contribution. Thus, impacts to regional air quality under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.



## (2) Localized Emissions

### *(a) Construction*

As Alternative 3 would develop the Project Site similar to the Project and construct the proposed buildings within the same footprint as the Project, construction activities associated with Alternative 3 would be located at similar distances from sensitive receptors as the Project. Since air emissions and fugitive dust from construction activities would be similar to those of the Project on maximum construction activity days, localized emissions under Alternative 3 would also be similar to those of the Project. Therefore, as with the Project, localized impacts under Alternative 3 would be less than significant. However, with the reduction of excavation activities, such impacts would be less than the less-than-significant impacts of the Project.

### *(b) Operation*

Localized operational impacts are determined primarily by peak-hour intersection traffic volumes. As discussed above, the number of net new peak-hour trips generated by Alternative 3 would be similar to the net new peak-hour trips generated by the Project. In addition, as with the Project, Alternative 3 would not introduce any new major sources of air pollution within the Project Site. Because the localized impacts analysis from on-site operational activities and the localized CO hotspot analysis associated with off-site operational activities for the Project did not result in any significant impacts, localized impacts under Alternative 3 also would be less than significant and similar to the less-than-significant impacts of the Project.

## (3) Toxic Air Contaminants

### *(a) Construction*

As with the Project, construction of Alternative 3 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.B, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. Overall construction TAC emissions generated by Alternative 3 would be less than those of the Project since excavation activities required during construction of Alternative 3 would be reduced. As with the Project, the construction phases which require the most heavy-duty diesel vehicle usage, such as site grading, would last for a short duration. Thus, construction of Alternative 3 also would not result in a substantial, long-term (i.e., 70-year) source of TAC emissions. Thus, impacts due to TAC emissions under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

*(b) Operation*

As set forth in Section IV.B, Air Quality, of this Draft EIR, the primary sources of potential TACs associated with Project operations would include diesel particulate matter from delivery trucks. Under Alternative 3, the overall increase in the number of deliveries and associated diesel particulate matter emissions would be similar to the Project since the same uses proposed by the Project would be constructed as part of Alternative 3. Similar to the Project, the land uses proposed under Alternative 3 are not considered land uses that generate substantial TAC emissions. Therefore, Alternative 3 would not release substantial amounts of TACs, and impacts would be less than significant. Such impacts would be similar to the less-than-significant impacts of the Project.

## **c. Cultural Resources**

### **(1) Historical Resources**

As discussed in Section IV.C, Cultural Resources, of this Draft EIR, the potential historic district consists of 35 buildings within the Sunset Gower Studios, 22 of which have been identified as contributors. Like the Project, Alternative 3 would require the demolition of 15 buildings within the boundary of the potential historic district, including six buildings that are contributors to the potential historic district and nine buildings that are non-contributors. As concluded in Section IV.C, Cultural Resources, of this Draft EIR, despite the loss of six contributing buildings, 16 of the 22 contributing buildings would remain intact and in their original location after implementation of the Project. In addition, like the Project, the important configuration of buildings, spatial relationships and circulation patterns that are characteristic of the period of significance would also remain after implementation of Alternative 3. As such, the proposed removal of contributing buildings to the potential historic district would not reduce the integrity of the potential historic district such that it can no longer convey its historic significance. Therefore, as with the Project, removal of contributing buildings caused by Alternative 3 would not result in significant impacts to historical resources (i.e., the potential historic district). In addition, Alternative 3 would implement similar mitigation measures as the Project to ensure the protection and proper maintenance of the potential historic district during and after implementation of Alternative 3.

With regard to individually eligible properties, similar to the Project, Alternative 3 would demolish the United Recording Building at 6050 Sunset Boulevard, which is one of three buildings on the Project Site that are eligible for historic listing as individual properties. Demolition of this building would result in significant impacts to a historic resource. As such, similar to the Project, impacts to historical resources under Alternative 3 would be significant and unavoidable and similar to the significant and unavoidable impacts of the Project.

## (2) Archaeological Resources

As previously discussed, Alternative 3 would eliminate one level of subterranean parking proposed by the Project under Building A and Basecamp. Therefore, Alternative 3 would require less excavation and would reduce the potential for uncovering unknown archaeological resources. Nevertheless, Alternative 3 would implement the same mitigation measure as the Project in order to mitigate potential impacts to archaeological resources. Overall, similar to the Project, potential impacts to archaeological resources would be less than significant with mitigation. However, due to the reduction in excavation activities, such impacts would be less than the less-than-significant impacts of the Project.

## (3) Human Remains

Alternative 3 would be implemented within the same Project Site as the Project. As discussed in Section IV.C, Cultural Resources, of this Draft EIR, the Project Site is located within an urbanized area and has been subject to previous grading and development. No known traditional burial sites have been identified on the Project Site. In addition, Alternative 3 would similarly comply with existing regulatory requirements in the event human remains were discovered during construction. Specifically, construction work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5, and disposition of the human remains and any associated grave goods would occur in accordance with Public Resources Code Section 5097.91 and 5097.98, as amended. Therefore, as with the Project, impacts related to human remains under Alternative 3 would be less than significant with implementation of regulatory requirements. However, as previously discussed, Alternative 3 would require less excavation activities compared to the Project. As such, impacts would be less than the impacts of the Project.

## d. Energy

### (1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

#### *(a) Construction*

Similar to the Project, construction activities associated with Alternative 3 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. As with the Project, Alternative 3 would also generate a demand for transportation energy associated with on- and off-road vehicles. Like the Project, construction activities associated with Alternative 3 would not involve the consumption of natural gas. The energy consumed during construction of Alternative 3 would be less than that of the Project due to the reduction in construction activities. As with

the Project, the electricity demand during construction of Alternative 3 would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Construction equipment used during construction of Alternative 3 would also comply with Title 24 requirements where applicable, similar to the Project. With regard to transportation fuels, trucks and equipment used during construction of Alternative 3 would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. Therefore, as with the Project, construction activities would use energy that is not wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 3 and similar to the less-than-significant impacts of the Project.

#### *(b) Operation*

As with the Project, operation of Alternative 3 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions. As described above, Alternative 3 would result in a similar amount of total floor area as the Project. Accordingly, the number of daily trips under Alternative 3 would be the same as for the Project. Therefore, the consumption of electricity, natural gas, and petroleum-based fuels would be similar to the Project. Like the Project, Alternative 3 would implement design features to reduce energy usage which would exceed Title 24 energy requirements. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 3 would not be wasteful, inefficient, or unnecessary. Overall, impacts related to energy use during operation of Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

### **(2) Conflict with Plans for Renewable Energy or Energy Efficiency**

As discussed in Section IV.D, Energy, of this Draft EIR, the current City of LA Green Building Code requires compliance with CalGreen and California's Building Energy Efficiency Standards (Title 24). Like the Project, Alternative 3 would comply with the City's Green Building Code, as well as be capable of achieving at least LEED® Silver equivalent status, which include conservation features to reduce natural gas usage. Therefore, similar to the Project, Alternative 3 would incorporate measures that are beyond current State and City energy conservation requirements. Also similar to the Project, Alternative 3 would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2019 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code. Therefore, as with the Project, Alternative 3 would not conflict with plans for renewable energy or energy efficiency. No impacts related to renewable energy or energy efficiency

plans would occur under Alternative 3, and impacts would be similar to the less-than-significant impacts of the Project.

### **e. Geology and Soils (Paleontological Resources)**

As described above, Alternative 3 would eliminate one level of subterranean parking proposed by the Project under Building A and Basecamp. Therefore, the potential for uncovering paleontological artifacts that were not recovered during prior construction or other human activity would be reduced compared to the Project. Nevertheless, Alternative 3 would implement the same mitigation measure as the Project in order to mitigate potential impacts to paleontological resources. Overall, similar to the Project, potential impacts to paleontological resources would be less than significant with mitigation. However, such impacts would be reduced compared to the Project due to the reduction in excavation activities under Alternative 3.

### **f. Greenhouse Gas Emissions**

GHG emissions from a development project are determined in large part by the number of daily trips generated and energy consumption from proposed land uses. As previously discussed, the number of daily trips as well as the amount of energy required by Alternative 3 would be similar to the Project due to the development of the same uses and total floor area as the Project. Thus, the amount of GHG emissions generated by Alternative 3 would be similar to the amount generated by the Project. As with the Project, Alternative 3 would be designed to comply with the requirements of the CALGreen Code and the Los Angeles Green Building Code. Alternative 3 would also incorporate design features to reduce GHG emissions and be capable of meeting the standards of LEED Silver or equivalent green building standards. With compliance with the CALGreen Code and the Los Angeles Green Building Code, and with the implementation of comparable sustainability features as the Project, Alternative 3 also would not conflict with any applicable plan, policy, regulation, or recommendation to reduce GHG emissions. Thus, impacts related to GHG emissions under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

### **g. Land Use**

As previously described, Alternative 3 would develop the Project Site similar to the Project. Therefore, due to the overall similarities in the development proposals of the Project and Alternative 3, this alternative would similarly not conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Thus, impacts related to conflicts with land use plans under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

## **h. Noise**

### **(1) Noise**

#### *(a) Construction*

The types of construction activities under Alternative 3 would be similar to the Project, although the amount of excavation activities and associated subterranean parking construction would be reduced due to the elimination of one subterranean parking level under Building A and Basecamp. As with the Project, construction of Alternative 3 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. While the overall duration and amount of construction may be reduced under Alternative 3, on- and off-site construction activities and the associated construction noise levels would be expected to be similar to the Project during maximum (peak) activity days. As such, noise levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Alternative 3 would comply with the same applicable regulatory requirements and implement similar design features and mitigation measures as the Project to reduce noise levels during construction. However, as with the Project, on-site and off-site construction noise impacts would be significant and avoidable. Overall, construction-related noise impacts under Alternative 3 would be similar to those of the Project.

#### *(b) Operation*

As discussed in Section IV.G, Noise, of this Draft EIR, sources of operational noise under the Project include (a) on-site stationary noise sources, such as outdoor mechanical equipment, activities within the proposed outdoor spaces, parking facilities, loading dock, and trash compactor; and (b) off-site mobile (roadway traffic) noise sources.

Alternative 3 would introduce noise from similar on-site and off-site noise sources as the Project. Due to the development of the same uses and buildings as the Project, the noise levels generated during Alternative 3 would be anticipated to be similar to the noise levels of the Project. In addition, similar to the Project, on-site mechanical equipment used during operation of Alternative 3 would comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. Thus, operational on-site noise impacts would be less than significant and similar to the less-than-significant impacts of the Project.

With regard to off-site noise sources, Alternative 3 would generate a similar amount of daily vehicle trips as the Project. As such, Alternative 3 would result in similar off-site traffic-related noise levels as the Project. Therefore, as with the Project, off-site noise

impacts under Alternative 3 would be less than significant and such impacts would be similar to those of the Project.

## (2) Vibration

As noted above, the types of construction activities under Alternative 2 would be similar to the Project, although construction activities would be reduced due to the elimination of one level of subterranean parking under Building A and Basecamp. As with the Project, construction of Alternative 3 would generate vibration from the use of heavy-duty construction equipment as well as from truck trips. While the overall amount of construction would be reduced, on- and off-site construction activities and the associated construction vibration levels would be expected to be similar to those of the Project during maximum (peak) activity days. As such, vibration levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Alternative 3 would also implement similar design features and mitigation measures as the Project to reduce on-site vibration levels during construction. As such, vibration impacts due to on- and off-site construction activities under Alternative 3 would similarly be less than significant with mitigation for on-site construction vibration (building damage), significant and unavoidable for on-site construction vibration (human annoyance), and less than significant for off-site construction vibration (with respect to both building damage and human annoyance). Overall, vibration impacts under Alternative 3 would be similar to the impacts of the Project.

## i. Public Services

### (1) Fire Protection

#### *(a) Construction*

As previously discussed, Alternative 3 would involve the elimination of one subterranean parking level proposed by the Project under Building A and Basecamp. As such, the overall duration of construction for Alternative 3 would be reduced compared to the Project. As with the Project, construction activities under Alternative 3 would have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, exposed electrical lines, chemical reactions, and lighted cigarettes. As with the Project, construction activities under Alternative 3 would comply with the safety and health provisions of OSHA. Construction would also occur in compliance with all applicable federal, State, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials.

Additionally, like the Project, construction activities associated with Alternative 3 also would generate traffic related to the movement of construction equipment, the hauling of

soil and construction materials to and from the Project Site, and construction worker traffic. These short-term and temporary construction activities could similarly temporarily affect emergency response for emergency vehicles along Sunset Boulevard and other main connectors due to traffic during the construction phase. However, as with the Project, the construction of Alternative 3 would not require the closure of any vehicle travel lanes as the majority of construction activities would take place within the Sunset Gower Studios campus. In addition, as with the Project, a Construction Management Plan would also be implemented as part of Alternative 3 to ensure that adequate and safe access remains available within and near the Project Site during construction activities. This alternative would also ensure that travel lanes would continue to be maintained in each direction throughout the construction period, and the scheduling of haul truck and construction worker trips outside weekday peak traffic periods to the extent feasible would lessen any potential impact. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent right-of-ways, as well as on the City-designated disaster routes along Hollywood Boulevard, Sunset Boulevard, and Vine Street. Overall, construction-related impacts related to fire protection services under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in construction activities and duration.

#### *(b) Operation*

As previously discussed, Alternative 3 would construct similar uses as the Project and would not include any residential uses. Therefore, Alternative 3 would not generate a new residential population in the service area of Fire Station No. 82 that would demand fire protection services provided by the LAFD. Thus, this alternative would generate a similar demand for LAFD fire protection services on a daily basis when compared to the Project. Specifically, since Alternative 3 would include the same uses and total floor area as the Project, Alternative 3 would generate the same daytime population as the Project (1,869 employees).<sup>12</sup> Similar to the Project, Alternative 3 would implement all applicable Building Code and Los Angeles Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Therefore, as with the Project, compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection, would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment. Alternative 3 would also include the installation of automatic fire sprinklers within the proposed buildings. Furthermore, like the Project, traffic generated by Alternative 3 would not significantly

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<sup>12</sup> *Employee generation rates of four employees per 1,000 square feet of floor area based on Applicant experience with studio projects of similar scope.*



impact emergency vehicle response to the Project Site and surrounding area as the drivers of emergency vehicles have the ability to bypass traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. The driveways and internal circulation under Alternative 3 would also be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. As with the Project, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for Alternative 3. Therefore, similar to the Project, Alternative 3 would not necessitate the construction of new or physically altered fire protection facilities, the construction of which would cause significant environmental impacts, in order to maintain service. As such, impacts with regard to fire protection services during operation of Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

## (2) Police Protection

### *(a) Construction*

As with the Project, construction activities associated with Alternative 3 would not be expected to generate a permanent residential population that would substantially increase the police service population of the Hollywood Area. Specifically, 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 Project. As such, Alternative 3 would not generate a new residential population on the Project Site or in the area during construction, which would result in the need for additional police protection services.

The types of construction activities proposed by Alternative 3 would be similar to the Project although the extent of such activities and overall duration of construction would be reduced compared to the Project due to a reduction in excavation and associated construction of one additional level of subterranean parking. Nevertheless, the potential for theft and vandalism during construction activities at the Project Site would be similar to the Project. As with the Project, Alternative 3 would implement temporary security measures to secure the Project Site during construction. With implementation of these security measures, potential impacts associated with theft and vandalism during construction activities would be less than significant.

As discussed in Section IV.H.2, Public Services—Police Protection, of this Draft EIR, construction activities could also potentially affect LAPD response to the Project Site and surrounding area. However, as discussed in Section IV.I, Transportation, of this Draft EIR, given the permitted hours of construction and nature of construction projects, most, if not all, of the construction worker and haul truck trips would occur outside the typical weekday

commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts. Also, similar to the Project, Alternative 3 would implement a Construction Management Plan during construction to ensure that adequate and safe access is available within and near the Project Site during construction activities. Furthermore, construction-related traffic generated by the Project would not significantly impact LAPD response in the vicinity of the Project Site as emergency vehicles have the ability to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Based on the above, Alternative 3 would not necessitate the provision of new or physically altered police facilities in order to maintain the LAPD's capability to serve the Project Site. Therefore, construction-related impacts to police protection services under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project due to the reduction in construction activities and duration.

#### *(b) Operation*

As previously discussed, Alternative 3 would construct the same uses and total floor area as the Project and would not include any residential uses. As such, the Project would generate the same daytime population as the Project (1,869 employees). Thus, like the Project, Alternative 3 would not cause a significant change to the current officer-to-resident ratio for the Hollywood Area as no residential uses are proposed. Thus, as with the Project, Alternative 3 would not result in the need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts, in order to maintain service. Therefore, impacts on police protection services would be less than significant and similar to the less-than-significant impacts of the Project.

### j. Transportation

As discussed above, Alternative 3 would be developed within the same Project Site as the Project; therefore, the plans, policies, and programs applicable to the Project would also apply to Alternative 3. Alternative 3 would include the same uses as the Project but would eliminate the third level of subterranean parking under Building A and Basecamp proposed by the Project. In total, Alternative 3 would reduce the number of new parking spaces provided as part of the Project by approximately 550 spaces. However, Alternative 3 would continue to meet the parking requirements of the LAMC. Overall, as with the Project, Alternative 3 would be consistent with the goals, policies, and requirements of the applicable plans. Specifically, consistent with the Mobility Plan, LAMC Section 12.37, and Vision Zero, Alternative 3 would not require any dedications or improvements along the streets adjacent to the Project Site perimeter. Similar to the Project, Alternative 3 would also promote pedestrian activity and reduce vehicle trips and VMT by encouraging the use of alternative modes of transportation; providing convenient and adequate bicycling facilities; and enhancing pedestrian amenities through the provision of roof gardens and

terraces, courtyards, paseos, and walkways, which would include accent paving, seating, and other landscape elements. As such, Alternative 3 would comply with the programs and policies set forth in the Mobility Plan, Plan for a Healthy Los Angeles, LAMC Section 12.21.A.16 and LAMC Section 12.26J, Citywide Design Guidelines, the Walkability Checklist, LADOT's Transportation Technology Strategy and Design Standards, SGAG RTP/SCS, Hollywood Community Plan, and the Redevelopment Plan to the same extent as the Project. Therefore, Alternative 3 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Thus, impacts would be similar to the less-than-significant impacts of the Project.

With respect to VMT, Alternative 3 does not include residential uses and would not result in any household VMT per capita. Prior to implementation of any project design features or mitigation measures, the proposed uses would result in 24,923 total work VMT, which equates to an average work VMT per employee of 6.2 similar to the Project.<sup>13</sup> As such, similar to the Project, the work VMT per employee for Alternative 3 would fall below the significance threshold for the Central APC of 7.6.<sup>14</sup> Therefore, impacts with respect to conflicts with CEQA Guidelines Section 15064.3, subdivision (b) would be similar to the less-than-significant impacts of the Project.

As with the Project, Alternative 3 would not introduce hazardous design features, so like the Project, no impact would occur. Lastly, similar to the Project, Alternative 3 would not interfere with emergency access; therefore, impacts would be less than significant.

## k. Tribal Cultural Resources

As noted above, Alternative 3 would eliminate one level of subterranean parking proposed by the Project under Building A and Basecamp. Therefore, the potential for Alternative 3 to uncover subsurface tribal cultural resources would be reduced when compared to that of the Project. In addition, as discussed in Section IV.J, Tribal Cultural Resources, of this Draft EIR, no known recorded tribal cultural resources have been identified within the Project Site or in the immediate vicinity of the Project Site. As such, like the Project, no impacts to tribal cultural resources would occur under Alternative 3 and impacts would be less when compared to the impacts of the Project.

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<sup>13</sup> Gibson Transportation Consulting, Inc., "Vehicle Miles Traveled Analysis of Project Alternatives for the Sunset Gower Studios Preservation and Enhancement Plan Hollywood, California," February 13, 2020. See Appendix J of this Draft EIR.

<sup>14</sup> Gibson Transportation Consulting, Inc., "Vehicle Miles Traveled Analysis of Project Alternatives for the Sunset Gower Studios Preservation and Enhancement Plan Hollywood, California," February 13, 2020. See Appendix J of this Draft EIR.

## **I. Utilities and Service Systems**

### **(1) Water Supply and Infrastructure**

#### *(a) Construction*

Similar to the Project, construction activities associated with Alternative 3 would result in a temporary demand for water associated with dust control, equipment and site cleanup, excavation and export, soil compaction and earthwork, mixing and placement of concrete, irrigation for plant and landscaping establishment, testing of water connections and flushing, and other short-term related activities. This demand would be less than the Project since construction activities under Alternative 3 would be reduced. As evaluated in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of Project construction. Since the water demand for construction activities under Alternative 3 would be less than that of the Project, the temporary and intermittent demand for water during construction under Alternative 3 would also be expected to be met by the City's available water supplies. Similarly, the existing LADWP water infrastructure would be adequate to provide the water flow necessary to serve Alternative 3. Therefore, impacts on water supply and infrastructure associated with construction activities would be less than significant under Alternative 3 and less when compared to the less-than-significant impacts of the Project.

#### *(b) Operation*

As with the Project, operation of Alternative 3 would generate an increased demand for water relative to existing conditions. Under the Reduced Excavation Alternative, one level of subterranean parking under Building A and Basecamp would be eliminated. Alternative 3 would otherwise be constructed with the same square-footage as the Project. Therefore, water demand under Alternative 3 would be mostly similar to the Project except that the amount of water used for cleaning the parking garage would be reduced as the parking area would be reduced. Thus, like the Project, the estimated net water demand under Alternative 3 would be within the available and projected water supplies for LADWP under normal, single-dry, and multi-dry years through the year 2040. In addition, as with the Project, Alternative 3 would connect to the existing mains within the surrounding streets. As Alternative 3 would require similar fire flow requirements pursuant to the LAMC as the Project, sufficient infrastructure capacity would also be available to provide fire water service to Alternative 3 and upgrades to the mainlines that serve the Project Site would not be required. Thus, operational impacts to water supply and infrastructure under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project.

## (2) Wastewater

### *(a) Construction*

Similar to the Project, construction activities for Alternative 3 would result in wastewater generation from construction workers on-site. However, as with the Project, portable restrooms and hand wash areas would be provided during construction, which would not contribute to wastewater flows to the City's wastewater system. Thus, wastewater generation from construction activities under Alternative 3 would not cause a measurable increase in wastewater flows.

As with the Project, Alternative 3 would not require or result in the construction of new wastewater treatment facilities or in the expansion of existing facilities. Like the Project, Alternative 3 would require construction activities associated with connecting on-site wastewater lines to the sewer mains adjacent to the Project Site in order to provide wastewater services to the proposed buildings. These construction activities would primarily be confined to trenching and would be limited to the on-site wastewater distribution as well as minor off-site work associated with connections to the public main. Therefore, construction-related impacts to the wastewater system under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

### *(b) Operation*

As with the Project, operation of Alternative 3 would generate greater wastewater flows relative to existing conditions. Since Alternative 3 would develop the same uses and floor area as the Project, the wastewater generation of Alternative 3 would be similar to that of the Project's. Thus, since the Project's wastewater flows would be accommodated by the existing infrastructure, the wastewater generated by Alternative 3 would also be accommodated by the existing capacity of any wastewater treatment plant, including the Hyperion Water Reclamation Plant, and impacts with respect to treatment capacity would be less than significant.

Similar to the Project, sewer service for Alternative 3 would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site. Given that wastewater flows generated by Alternative 3 would be similar to the estimated wastewater flow of the Project, it is anticipated that there would be sufficient capacity within the sewer lines serving the Project Site to accommodate the flows from Alternative 3. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for Alternative 3 during the permitting process. In addition, sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Thus, operational impacts with regard to

wastewater generation and infrastructure capacity under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

### (3) Energy and Telecommunications Infrastructure

#### *(a) Energy Infrastructure*

##### *(i) Construction*

As discussed above, Alternative 3 would reduce the amount of energy needed for construction activities based on the reduction in excavation. As discussed in Section IV.K.3, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR, the estimated energy usage of the Project during construction would be within the available capacity and supply of the existing infrastructure. Since Alternative 3 would generate a reduced demand for energy during construction compared to the Project, the energy demand of Alternative 3 would similarly be within the available capacity of the existing infrastructure. Therefore, impacts to energy infrastructure capacity would be less than significant and less when compared to the less-than-significant impacts of the Project.

##### *(ii) Operation*

As previously discussed, the total energy consumption of Alternative 3 would be similar to that of the Project. Therefore, as with the Project, the existing energy infrastructure would similarly have capacity to support Alternative 3. Impacts related to energy infrastructure would be less than significant under Alternative 3 and similar to the less-than-significant impacts of the Project.

#### *(b) Telecommunications Infrastructure*

With regard to telecommunication facilities, Alternative 3 would require construction of new on-site telecommunications infrastructure to serve new buildings and potential upgrades and/or relocation of existing telecommunications infrastructure, as with the Project. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. However, as with the Project, a Construction Management Plan would be implemented during construction of Alternative 3 to ensure safe pedestrian access and vehicle travel throughout the construction period. In addition, when considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration (i.e., months) and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would primarily take place on-site, with minor off-site work associated with connections to the public system. As with the Project, no upgrades to off-site telecommunications systems are anticipated. In addition, any work that may affect services to the existing telecommunications lines would

be coordinated with service providers. Thus, as with the Project, impacts related to telecommunications infrastructure would be less than significant under Alternative 3 and similar to the less-than-significant impacts of the Project.

### **3. Comparison of Impacts**

As analyzed above, while Alternative 3 would reduce construction activities due to the elimination of one level of subterranean parking proposed by the Project, Alternative 3 would not eliminate any of the Project's significant and unavoidable impacts. Specifically, the Project's significant and unavoidable impacts related to air quality from regional construction emissions, historical resources, on-site and off-site construction noise, and vibration from on-site construction (human annoyance) would remain with development of Alternative 3. Alternative 3 also would not eliminate the Project's significant and unavoidable cumulative impacts related to air quality from regional construction emissions and off-site construction noise. The remaining impacts would be similar to, or less than, those of the Project.

### **4. Relationship of the Alternative to Project Objectives**

With a similar mix of uses as the Project, Alternative 3 would meet the underlying purpose of the Project to provide television, video, and motion picture production facilities, while supporting the evolving needs of the entertainment industry for creative office space, enhanced post-production facilities, and other studio-related facilities. In addition, Alternative 3 would achieve the following Project objectives:

- Consistent with the objective of the Hollywood Community Plan to further the development of Hollywood as a major center of entertainment and to perpetuate its image as the international center of the motion picture industry, substantially enhance the existing studio/media-related office and office production uses within an existing studio campus to ensure continued viability of the studios.
- In support of the objective of the Hollywood Community Plan to promote economic well-being and public convenience through encouraging the revitalization of the motion picture industry, create a secure campus environment where media and entertainment related uses are consolidated with production, post-production, and administrative offices in order to maximize creativity and productivity.
- Consistent with the objective of the General Plan to maintain significant historic and architectural resources and districts while allowing for the development of economically viable uses, establish clear guidelines for the preservation of the historic character of the Project Site while providing an upgraded creative office

space and production-supporting uses on the Project Site in a manner that respects and preserves the majority of identified historic resources and districts.

- Enhance an existing studio site along a transit corridor and within a high activity area where media and entertainment related uses are consolidated with production, post-production, and administrative offices in one site to promote sustainability and reduce vehicle miles traveled, with associated reductions in air quality and greenhouse gas emissions.
- Design and construct economically-viable and new state-of-the-art and technologically advanced creative office and production support spaces with the integrated density, infrastructure, parking, and technology to attract high-quality media and creative office tenants to a key corridor in Hollywood and to meet the existing and anticipated future demand of the movie, television, and entertainment industry and to allow flexibility to incorporate future technology advances.
- Provide an enhanced studio campus environment that creates new media-related employment opportunities serving movie, television, and entertainment industries, as well as construction jobs, providing opportunities for local and regional economic growth for a rapidly growing neighborhood residential population and locate jobs on a site that is easily accessible through public transportation.
- 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.

However, Alternative 3 would not meet the following objectives to the same extent as the Project due to the reduction in parking:

- Provide adequate and safe parking that satisfies the unique demand of the entertainment industry with direct access to the proposed uses, including truck circulation and maintenance of the production “basecamp” to allow for the flexible and efficient staging of trucks and trailers needed for film and television productions, and to enhance efficiency and safety.



## **V. Alternatives**

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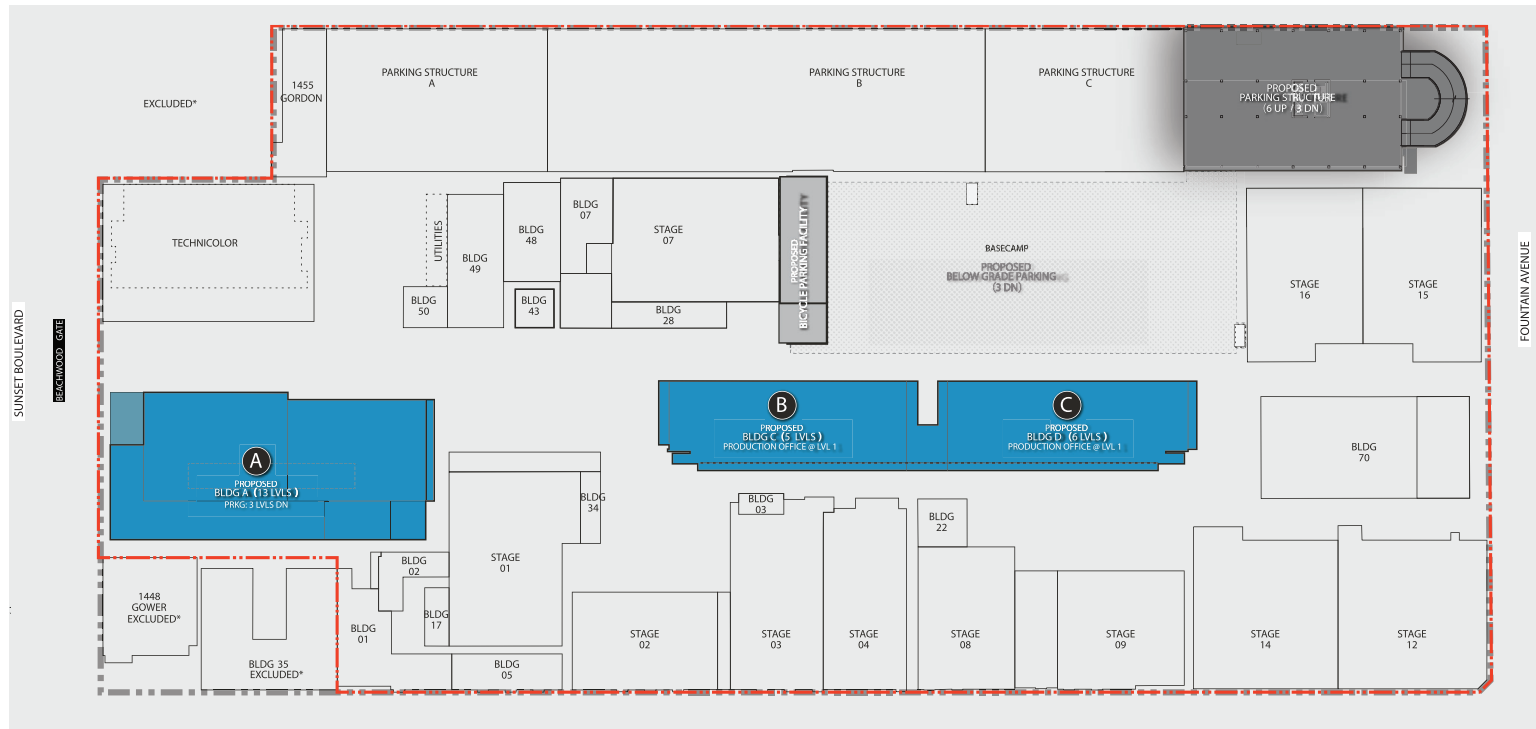
### **D. Alternative 4: Reduced Intensity Alternative**

#### **1. Description of the Alternative**

Alternative 4, the Reduced Intensity Alternative, would reduce the amount of total new floor area proposed by the Project by approximately 25 percent. Specifically, Alternative 4 would reduce the total floor area of Building A from 478,851 square feet to 321,850 square feet. The remaining components of the Project, including Building B, Building C, the bicycle parking facility, and vehicular parking would be provided as proposed by the Project. With the reduction in floor area of Building A proposed by Alternative 4, the number of stories and height of Building A would be reduced from 18 stories to 13 stories with a height of 225 feet compared to the Project's height of 300 feet. Overall, Alternative 4 proposes the development of 470,956 square feet of floor area (a reduction of 157,001 square feet compared to the 627,957 square feet of floor area proposed by the Project). As with the Project, Alternative 4 would remove 160,611 square feet of existing floor area, resulting in a net increase of approximately 310,345 square feet of net new floor area on the Project Site (compared to the Project's 467,346 square feet of net new floor area).

As shown in the conceptual site plan of Alternative 4 provided in Figure V-3 on page V-73, the proposed buildings would be located on the Project Site similar to the Project with Building A situated along Sunset Boulevard, Building B and Building C located internal to the Project Site, and the proposed parking structure located along Gordon Street. In addition, while the height of Building A would be reduced under Alternative 4, the overall design of the buildings, including architectural features, lighting and signage, and sustainability, would be similar to that of the Project. Similarly, Alternative 4 would feature similar vehicular, pedestrian, and bicycle access as the Project.

As discussed above, parking under Alternative 4 would be constructed similar to the Project and would include 1,335 new spaces as follows: (1) up to 525 spaces within a new parking structure with six above-grade levels and three subterranean parking levels; (2) up to 531 spaces within three subterranean parking levels below the existing basecamp and below a proposed 1,450-square-foot bicycle parking facility; and (3) up to 279 spaces within three subterranean levels below Building A.



**Figure V-3**  
Alternative 4 Conceptual Site Plan

As with the Project, Alternative 4 would create a variety of landscaped gathering areas to enhance the existing pedestrian environment internal to the Project Site, including a paseo, a central plaza area, courtyards, and roof gardens and terraces. These areas would include trees, accent paving, seating, and other landscaping features throughout the Project Site.

Similar to the Project, construction of Alternative 4 would be developed in multiple phases and would include similar grading and excavation activities as the Project. However, given the reduction in uses, the construction period would be reduced compared to that of the Project.

As with the Project, Alternative 4 would require a Conditional Use Permit for a Major Development Project; Conditional Use Permit to permit Floor Area Ratio Averaging in Unified Developments; Conditional Use Permit to permit a Commercial Corner Development; Vesting Tentative Tract Map; Site Plan Review; Haul Route approval; and demolition, grading, excavation, foundation, and associated building permits as required.

## **2. Environmental Impacts**

### **a. Aesthetics**

As discussed in Section IV.A, Aesthetics, of this Draft EIR, the Project Site is identified by the City as being located within a transit priority area. In addition, the Project is an employment center project and is located on an infill site which meets Public Resources Code Section 21099's definition of an infill site as a lot located within an urban area that has been previously developed. The Project Site is also located within 0.5 mile from several bus lines, the majority of which provide a frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. Therefore, pursuant to Senate Bill 743 and Zoning Information File 2452, the Project's aesthetic impacts shall not be considered significant impacts on the environment. As such, the analysis included in Section IV.A, Aesthetics, of this Draft EIR, is provided for informational purposes only.

Alternative 4 would similarly meet the provisions of Senate Bill 743 as it would be developed within the same Project Site and with similar uses as the Project. As such, Alternative 4 would also be considered an employment center project located on an infill site within a transit priority area. Therefore, as with the Project, the following discussion regarding aesthetics is provided for informational purposes only.

## (1) Visual Character<sup>15</sup>

### (a) Construction

Similar to the Project, during construction of Alternative 4, the visual character and quality of the Project Site and adjacent roadways would be altered due to the removal of some of the existing structures; site preparation, grading, and excavation; the staging of construction equipment and materials; and the construction of building foundations and proposed structures. Similar to the Project, while some of the construction activities associated with Alternative 4 would occur within the internal, central portion of the Project Site, construction activities would also occur along Sunset Boulevard, Gordon Street, and Fountain Avenue. Therefore, some construction activities would be visible to pedestrians and motorists on these adjacent streets, as well as to viewers within nearby buildings. However, the appearance of the Project Site during construction of Alternative 4 would be typical of construction sites in urban areas. In addition, construction activities would be temporary in nature, and the visual impacts associated with construction activities would cease upon the completion of the construction phase of this alternative. Alternative 4 would also implement similar design features as the Project, including the installation of temporary construction fencing to screen much of the construction activity from view at the street level, maintaining pedestrian walkways and construction fencing in a visually attractive manner, and shielding outdoor lighting used during construction.

As with the Project, construction of Alternative 4 would also require the removal of ornamental trees within the Project Site, some of which may be visible from the street. The removal of these trees could temporarily reduce the visual quality of the Project Site during the construction phase to the extent that the interior trees are visible from the public right-of-way. However, all existing trees to be removed within the Project Site would be replaced on at least a 1:1 basis in accordance with City requirements. While not anticipated, should any street trees be removed, street trees would be replaced on a 2:1 basis in accordance with City policy. In addition, as part of Alternative 4, ample on-site landscaping would be provided to enhance the streetscape, including a landscaped paseo, a central plaza area, courtyards, and rooftop gardens and terraces. As such, the removal of existing on-site trees during construction would not substantially or permanently alter or degrade the existing visual character of the Project Site or vicinity.

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<sup>15</sup> As previously noted, subsequent to the release of the Initial Study for the Project, the State CEQA Guidelines Appendix G threshold questions were revised. Prior to the release of the revised thresholds, the substantial degradation of the existing visual character or quality of a site and its surrounding was evaluated under aesthetics. The threshold has since been replaced by a new threshold question that considers whether a project would conflict with applicable zoning and other regulations governing scenic quality. However, as the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, stated that the Project's potential effects related to visual character and quality would be addressed in the EIR, this analysis is included for information purposes only.

Overall, while affecting the visual character of the Project Site and vicinity on a temporary basis, construction activities associated with Alternative 4 would not substantially and adversely alter or degrade the existing visual character or quality of the Project Site and surrounding area. Based on the above, impacts related to visual character during construction of Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project due to the reduced construction activities and duration.

### *(b) Operation*

Due to the similarities in the proposed development between the Project and Alternative 4, the effects to visual character and quality associated with Alternative 4 would be similar to those of the Project. Specifically, as discussed in Section IV.A, Aesthetics, of this Draft EIR, the Project would remove 21 buildings and would introduce three new buildings, a parking structure, and a bicycle parking facility. These same changes to the Project Site are proposed by Alternative 4 although the height of Building A would be reduced compared to the Project. Alternative 4 also proposes removal of the existing United Recording Building located at 6050 Sunset Boulevard, which is considered a historic resource. However, as evaluated in Section IV.A, Aesthetics, of this Draft EIR, the architecture of the United Recording Building does not contribute to the visual character or quality of the Project Site and surroundings. Accordingly, the demolition of the 6050 Sunset Boulevard building would not result in the loss of a unique visual resource and would not substantially degrade the visual character or quality of the Project Site and its surroundings. Additionally, as with the Project, the buildings proposed by Alternative 4 would be designed in a contemporary architectural style that would feature compatible massing, heights, and design elements that would be appropriate with the context of the surrounding uses. Overall, as with the Project, relative to the surrounding development, Alternative 4 would complement the varying design elements of both the commercial and residential uses adjacent to the Project Site and would allow for the integration of the Project Site, providing a visually unified space while modernizing and improving the functionality of the studio. The extent to which this alternative would complement the surrounding uses in terms of the visual character would be greater compared to the Project due to the reduced height of Building A along Sunset Boulevard. Therefore, as with the Project, Alternative 4 would not substantially degrade the existing visual character or quality of the Project Site and its surroundings. Impacts to visual character would be less than significant and less than the less-than-significant impacts of the Project due to the reduced building height of Building A.

## (2) Conflict with Applicable Regulations Governing Scenic Quality

As described above, Alternative 4 would develop the Project Site similar to the Project while reducing certain uses. Overall, with the development of similar uses as the Project, Alternative 4 also would not conflict with the zoning and other regulations

governing scenic quality. Thus, impacts would be less than significant. However, with the reduction in uses, such impacts would be less than those of the Project.

## **b. Air Quality**

### **(1) Regional Emissions**

#### *(a) Construction*

As with the Project, construction of Alternative 4 has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.B, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Under Alternative 4, construction activities would be reduced in comparison to the Project due to the reduction in development. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities because Alternative 4 would involve the same amount of excavation and demolition as the Project. Because maximum daily conditions are used for measuring impact significance, similar to the Project, Alternative 4 would exceed the regional air quality threshold for NO<sub>x</sub> emissions. Therefore, as with the Project, Alternative 4 would result in significant and unavoidable impacts associated with regional construction emissions. However, such impacts would be less than those of the Project due to reduced construction activities.

#### *(b) Operation*

As previously discussed, Alternative 4 would reduce the amount of new floor area by approximately 25 percent. Like the Project, operational regional air pollutant emissions associated with Alternative 4 would be generated by vehicle trips to the Project Site, which are the largest contributors to operational air pollutant emissions, and the consumption of electricity and natural gas. As provided in Appendix J of this Draft EIR, the number of net new daily vehicle trips generated by Alternative 4 would be less than the net new daily vehicle trips generated by the Project. Specifically, Alternative 4 would result in a total of 2,734 vehicular daily trips compared to the Project's 4,110 daily trips a reduction of approximately 33.5 percent. Since the amount of vehicular emissions is based on the number of trips generated, the overall pollutant emissions generated by Alternative 4 would be less than the emissions generated by the Project. In addition, with the reduction in overall floor area, both area sources and stationary sources would also generate less on-site operational air emissions compared to the Project. Therefore, under Alternative 4,

total contributions to regional air pollutant emissions during operation would be less than the Project's contribution. Thus, impacts to regional air quality under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project.

## (2) Localized Emissions

### *(a) Construction*

As Alternative 4 would develop the Project Site similar to the Project and construct the proposed uses under Alternative 4 within the same footprint as the Project, construction activities associated with Alternative 4 would be located at similar distances from sensitive receptors as the Project. Since air emissions and fugitive dust from construction activities would be similar to those of the Project on maximum construction activity days, localized emissions under Alternative 4 would also be similar to those of the Project. Therefore, as with the Project, localized impacts under Alternative 4 would be less than significant. However, due to the reduction in development and associated construction activities, such impacts would be less than those of the Project.

### *(b) Operation*

Localized operational impacts are determined primarily by peak-hour intersection traffic volumes. As provided in Appendix J of this Draft EIR, the number of net new peak-hour trips generated by Alternative 4 would be less than the net new peak-hour trips generated by the Project. Specifically, Alternative 4 would generate 328 A.M. peak hour trips compared to the Project's 492 A.M. peak hour trips and 325 P.M. peak hour trips compared to the Project's 488 P.M. peak hour trips. In addition, as with the Project, Alternative 4 would not introduce any new major sources of air pollution within the Project Site. Because the localized impacts analysis from on-site operational activities and the localized CO hotspot analysis associated with off-site operational activities for the Project did not result in any significant impacts, localized impacts under Alternative 4 also would be less than significant and less when compared to the less-than-significant impacts of the Project.

## (3) Toxic Air Contaminants

### *(a) Construction*

As with the Project, construction of Alternative 4 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions and such activities under Alternative 4 would be similar to the Project. As discussed in Section IV.B, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. While construction activities would be reduced due to the

reduction in development, overall construction TAC emissions generated by grading and excavation activities proposed as part of Alternative 4 would be similar to the Project. Thus, impacts due to TAC emissions under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

*(b) Operation*

As set forth in Section IV.B, Air Quality, of this Draft EIR, the primary sources of potential TACs associated with Project operations would include diesel particulate matter from delivery trucks. Under Alternative 4, the overall increase in the number of deliveries and associated diesel particulate matter emissions would be reduced compared to the Project due to the reduction in the amount of new floor area. Similar to the Project, the land uses proposed under Alternative 4 are not considered land uses that generate substantial TAC emissions. Therefore, Alternative 4 would not release substantial amounts of TACs, and impacts would be less than significant. Such impacts would be less than the less-than-significant impacts of the Project.

## **c. Cultural Resources**

### **(1) Historical Resources**

As discussed in Section IV.C, Cultural Resources, of this Draft EIR, the potential historic district consists of 35 buildings within the Sunset Gower Studios, 22 of which have been identified as contributors. Like the Project, Alternative 4 would require the demolition of 15 buildings within the boundary of the potential historic district, including six buildings that are contributors to the potential historic district and nine buildings that are non-contributors. As concluded in Section IV.C, Cultural Resources, of this Draft EIR, despite the loss of six contributing buildings, 16 of the 22 contributing buildings would remain intact and in their original location after implementation of the Project. In addition, like the Project, the important configuration of buildings, spatial relationships and circulation patterns that are characteristic of the period of significance would also remain after implementation of Alternative 4. As such, the proposed removal of contributing buildings to the potential historic district would not reduce the integrity of the potential historic district such that it can no longer convey its historic significance. Therefore, as with the Project, removal of contributing buildings caused by Alternative 4 would not result in significant impacts to historical resources (i.e., the potential historic district). In addition, Alternative 4 would implement similar mitigation measures as the Project to ensure the protection and proper maintenance of the potential historic district during and after implementation of Alternative 4.

With regard to individually eligible properties, similar to the Project, Alternative 4 would demolish the United Recording Building at 6050 Sunset Boulevard, which is one of



three buildings on the Project Site that are eligible for historic listing as individual properties. Demolition of this building would result in significant impacts to a historic resource. As such, similar to the Project, impacts to historical resources under Alternative 4 would be significant and unavoidable and similar to the significant and unavoidable impacts of the Project.

## (2) Archaeological Resources

As previously discussed, grading and excavation activities proposed by the Project would be the same for Alternative 4. Therefore, Alternative 4 would result in the same potential for uncovering unknown archaeological resources as the Project. As such, Alternative 4 would comply with the same regulatory requirements and would implement the same mitigation measure as the Project in the event archaeological resources are uncovered during construction. Overall, similar to the Project, potential impacts under Alternative 4 would be less than significant with mitigation. Such impacts would be similar to the less-than-significant with mitigation impacts of the Project.

## (3) Human Remains

Alternative 4 would be implemented within the same Project Site as the Project. As discussed in Section IV.C, Cultural Resources, of this Draft EIR, the Project Site is located within an urbanized area and has been subject to previous grading and development. No known traditional burial sites have been identified on the Project Site. In addition, Alternative 4 would similarly comply with existing regulatory requirements in the event human remains were discovered during construction. Specifically, construction work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5, and disposition of the human remains and any associated grave goods would occur in accordance with Public Resources Code Section 5097.91 and 5097.98, as amended. Therefore, as with the Project, impacts related to human remains under Alternative 4 would be less than significant with implementation of regulatory requirements. Due to similar grading and excavation activities, such impacts would be similar to the impacts of the Project.

## d. Energy

### (1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

#### *(a) Construction*

Similar to the Project, construction activities associated with Alternative 4 would consume electricity to supply and convey water for dust control and, on a limited basis,

may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. As with the Project, Alternative 4 would also generate a demand for transportation energy associated with on- and off-road vehicles. Like the Project, construction activities associated with Alternative 4 would not involve the consumption of natural gas. The energy consumed during construction of Alternative 4 would be less than that of the Project due to the reduction in construction activities. As with the Project, the electricity demand during construction of Alternative 4 would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Construction equipment used during construction of Alternative 4 would also comply with Title 24 requirements where applicable, similar to the Project. With regard to transportation fuels, trucks and equipment used during construction of Alternative 4 would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. Therefore, as with the Project, construction activities associated with Alternative 4 would use energy that is not wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 4 and similar to the less-than-significant impacts of the Project.

#### *(b) Operation*

As with the Project, operation of Alternative 4 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions. As described above, Alternative 4 would result in a reduction in the amount of total floor area compared to the Project. Accordingly, the number of daily trips under Alternative 4 would result in a total of 2,734 vehicular daily trips compared to the Project's 4,110 daily trips, a reduction of 1,376 daily trips. Therefore, the consumption of electricity, natural gas, and petroleum-based fuels would be less than the Project. Like the Project, Alternative 4 would implement design features to reduce energy usage would exceed Title 24 energy requirements. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 4 would not be wasteful, inefficient, or unnecessary. Overall, impacts related to energy use during operation of Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

## **(2) Conflict with Plans for Renewable Energy or Energy Efficiency**

As discussed in Section IV.D, Energy, of this Draft EIR, the current City of LA Green Building Code requires compliance with CalGreen and California's Building Energy Efficiency Standards (Title 24). Like the Project, Alternative 4 would comply with the City's

Green Building Code, as well as be capable of achieving at least LEED® Silver equivalent status, which include conservation features to reduce natural gas usage. Therefore, similar to the Project, Alternative 4 would incorporate measures that are beyond current State and City energy conservation requirements. Also similar to the Project, Alternative 4 would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2019 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code. Therefore, as with the Project, Alternative 4 would not conflict with plans for renewable energy or energy efficiency. No impacts related to renewable energy or energy efficiency plans would occur under Alternative 4, and impacts would be similar to the less-than-significant impacts of the Project.

### **e. Geology and Soils (Paleontological Resources)**

As described above, Alternative 4 would involve the same grading and excavation activities as the Project. Therefore, Alternative 4 would implement a similar mitigation measure as the Project in order to mitigate potential impacts to paleontological resources. Therefore, similar to the Project, potential impacts to paleontological resources would be less than significant with mitigation, and would be similar to the less-than-significant with mitigation impacts of the Project.

### **f. Greenhouse Gas Emissions**

GHG emissions from a development project are determined in large part by the number of daily trips generated and energy consumption from proposed land uses. Under Alternative 4, the trip generation and energy required by the proposed land uses would be reduced compared to the Project due to the reduction in overall development. Thus, the amount of GHG emissions generated by Alternative 4 would be less than the amount generated by the Project. As with the Project, Alternative 4 would be designed to comply with the requirements of the CALGreen Code and the Los Angeles Green Building Code. Alternative 4 would also incorporate design features to reduce GHG emissions and be capable of meeting the standards of LEED Silver or equivalent green building standards. With compliance with the CALGreen Code and the Los Angeles Green Building Code, and with the implementation of comparable sustainability features as the Project, Alternative 4 also would not conflict with any applicable plan, policy, regulation or recommendation to reduce GHG emissions. Thus, impacts related to GHG emissions under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project.

## **g. Land Use**

As previously described, Alternative 4 would develop the Project Site similar to the Project although the floor area of Building A would be reduced. Due to the overall similarities in the development proposals of the Project and Alternative 4, this alternative would similarly not conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Thus, impacts related to conflicts with land use plans under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

## **h. Noise**

### **(1) Noise**

#### *(a) Construction*

The types of construction activities under Alternative 4 would be similar to the Project, although the amount and duration of construction would be reduced due to the reduction in development. As with the Project, construction of Alternative 4 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. While the overall amount and duration of construction would be reduced under Alternative 4, on- and off-site construction activities and the associated construction noise levels would be expected to be similar to those of the Project during maximum (peak) construction activity days. As such, noise levels associated with construction of Alternative 4 during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Alternative 4 would comply with the same applicable regulatory requirements and implement similar design features and mitigation measures as the Project to reduce noise levels during construction. However, as with the Project, on-site and off-site construction noise impacts under Alternative 4 would be significant and unavoidable. Overall, construction-related noise impacts under Alternative 4 would be less than those of the Project as such impacts would be experienced during a shorter duration.

#### *(b) Operation*

As discussed in Section IV.G, Noise, of this Draft EIR, sources of operational noise under the Project include (a) on-site stationary noise sources, such as outdoor mechanical equipment, activities within the proposed outdoor spaces, parking facilities, loading dock, and trash compactor; and (b) off-site mobile (roadway traffic) noise sources.

Alternative 4 would introduce noise from similar on-site and off-site noise sources as the Project. However, it is anticipated that with the overall reduction in total floor area and uses, the noise levels from building mechanical equipment would be reduced. Noise levels

from the proposed outdoor spaces, parking facilities, loading dock, and trash compactor would be similar to the Project. In addition, similar to the Project, on-site mechanical equipment used during operation of Alternative 4 would comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. Thus, operational on-site noise impacts would be less than significant and less when compared to the less-than-significant impacts of the Project.

With regard to off-site noise sources, Alternative 4 would result in a reduction in daily vehicle trips compared to the Project. The reduction in vehicle trips would result in a decrease in off-site traffic-related noise levels under Alternative 4. Therefore, as with the Project, off-site noise impacts under Alternative 4 would be less than significant. Such impacts would be less than those of the Project due to the reduction in vehicle trips.

## (2) Vibration

As noted above, the types of construction activities under Alternative 4 would be similar to the Project, although the amount of new building construction would be reduced due to the reduction in total development compared to the Project. As with the Project, construction of Alternative 4 would generate vibration from the use of heavy-duty construction equipment as well as from truck trips. While the overall amount of construction would be reduced, on- and off-site construction activities and the associated construction vibration levels would be expected to be similar to those of the Project during maximum (peak) construction activity days. As such, vibration levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Alternative 4 would also implement similar design features and mitigation measures as the Project to reduce on-site vibration levels during construction. As such, vibration impacts due to on- and off-site construction activities under Alternative 4 would similarly be less than significant with mitigation for on-site construction vibration (building damage), significant and unavoidable for on-site construction vibration (human annoyance), and less than significant for off-site construction vibration (with respect to both building damage and human annoyance). Overall, vibration impacts under Alternative 4 would be similar to the impacts of the Project.

## i. Public Services

### (1) Fire Protection

#### *(a) Construction*

Alternative 4 would result in an overall reduction in total floor area compared to the Project. Therefore, the overall duration of construction for Alternative 4 would be reduced

compared to the Project. As with the Project, construction activities under Alternative 4 would have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, exposed electrical lines, chemical reactions, and lighted cigarettes. As with the Project, construction activities under Alternative 4 would comply with the safety and health provisions of OSHA. Construction would also occur in compliance with all applicable federal, State, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials.

Like the Project, construction activities associated with Alternative 4 also would generate traffic related to the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. These short-term and temporary construction activities could similarly temporarily affect emergency response for emergency vehicles along Sunset Boulevard and other main connectors due to traffic during the construction phase. However, as with the Project, the construction of Alternative 4 would not require the closure of any vehicle travel lanes as the majority of construction activities would take place within the Sunset Gower Studios campus. In addition, as with the Project, a Construction Management Plan would also be implemented as part of Alternative 4 to ensure that adequate and safe access remains available within and near the Project Site during construction activities. This alternative would also ensure that travel lanes would continue to be maintained in each direction throughout the construction period, and the scheduling of haul truck and construction worker trips outside weekday peak traffic periods to the extent feasible would lessen any potential impact. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent right-of-ways, as well as on the City-designated disaster routes along Hollywood Boulevard, Sunset Boulevard, and Vine Street. Overall, construction-related impacts related to fire protection services under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in construction activities and duration.

### *(b) Operation*

As previously discussed, Alternative 4 would construct similar uses as the Project and would not include any residential uses. Therefore, Alternative 4 would not generate a new residential population in the service area of Fire Station No. 82 that would demand fire protection services provided by the LAFD. Based on information provided by the Applicant,<sup>16</sup> Alternative 4 would generate a net increase of approximately 1,241 employees

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<sup>16</sup> *Employee generation rates of four employees per 1,000 square feet of floor area based on Applicant experience with studio projects of similar scope.*

compared to the Project's net increase of approximately 1,869 employees. Thus, Alternative 4 would generate a lower daytime population compared to the Project. Similar to the Project, Alternative 4 would implement all applicable Building Code and Los Angeles Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Therefore, as with the Project, compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection, would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment. Alternative 4 would also include the installation of automatic fire sprinklers within the proposed buildings. Furthermore, like the Project, traffic generated by Alternative 4 would not significantly impact emergency vehicle response to the Project Site and surrounding area as the drivers of emergency vehicles have the ability to bypass traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. The driveways and internal circulation under Alternative 4 would also be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. As with the Project, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for Alternative 4. As such, similar to the Project, this alternative would not necessitate the construction of new fire protection facilities, the construction of which would cause significant environmental impacts, in order to maintain service. Therefore, impacts with regard to fire protection services during operation of Alternative 4 would be less than significant. However, with the reduction in development, such impact would be less when compared to the less-than-significant impacts of the Project.

## (2) Police Protection

### *(a) Construction*

Similar to the Project, construction activities associated with Alternative 4 would not be expected to generate a permanent residential population that would substantially increase the police service population of the Hollywood Area. Specifically, 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 Project. Therefore, Alternative 4 would not generate a new residential population on the Project Site or in the area during construction, which would result in the need for additional police protection services.

The types of construction activities would be similar to the Project under Alternative 4 although the extent of such activities and overall duration of construction would be reduced compared to the Project due to a reduction in development. Nevertheless, the potential for theft and vandalism during construction activities at the Project Site would be

similar to the Project. As with the Project, Alternative 4 would implement temporary security measures to secure the Project Site during construction. With implementation of these security measures, potential impacts associated with theft and vandalism during construction activities would be less than significant.

As discussed in Section IV.H.2, Public Services—Police Protection, of this Draft EIR, construction activities could also potentially affect LAPD response to the Project Site and surrounding area. However, as discussed in Section IV.I, Transportation, of this Draft EIR, given the permitted hours of construction and nature of construction projects, most, if not all, of the construction worker and haul truck trips would occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts. Also, similar to the Project, Alternative 4 would implement a Construction Management Plan during construction to ensure that adequate and safe access is available within and near the Project Site during construction activities. Furthermore, construction-related traffic generated by the Project would not significantly impact LAPD response in the vicinity of the Project Site as emergency vehicles have the ability to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Based on the above, similar to the Project, Alternative 4 would not necessitate the provision of new or physically altered police facilities in order to maintain the LAPD's capability to serve the Project Site. Therefore, construction-related impacts to police protection services under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in construction activities and duration.

### *(b) Operation*

As previously discussed, this alternative would include the same uses as the Project but would reduce the amount of new floor area compared to the Project. As provided above, Alternative 4 would generate a net increase of approximately 1,241 employees.<sup>17</sup> compared to the Project's net increase of approximately 1,869 employees. As such, the overall increased demand in police protection services would be reduced compared to the Project due to the reduction in total floor area. Accordingly, the increase in the existing police service population for the Hollywood Community Police Station generated by Alternative 4 would be less than that of the Project. As with the Project, Alternative 4 would not cause a significant change to the current officer-to-resident ratio for the Hollywood Area. Thus, as with the Project, Alternative 4 would not result in the need for new or physically altered police protection facilities, the construction of which would cause significant

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<sup>17</sup> Employee generation rates of four employees per 1,000 square feet of floor area based on Applicant experience with office projects of similar scope.



environmental impacts, in order to maintain service. Therefore, impacts on police protection services would be less than significant and less when compared to the less-than-significant impacts of the Project.

## j. Transportation

As previously discussed, Alternative 4 would be developed within the same Project Site as the Project. As such, the plans, policies, and programs applicable to the Project would also apply to Alternative 4. As discussed above, while Alternative 4 would include a reduction in the uses proposed by the Project, Alternative 4 would feature similar vehicular, pedestrian, and bicycle access as the Project. In addition, parking would be provided similar to the Project. Therefore, overall, Alternative 2 would be consistent with the goals, policies, and requirements of the applicable plans similar to the Project. Specifically, consistent with the Mobility Plan, LAMC Section 12.37, and Vision Zero, Alternative 4 would not require any dedications or improvements along the streets adjacent to the Project Site perimeter. In addition, similar to the Project, Alternative 4 would promote pedestrian activity and reduce vehicle trips and VMT by encouraging the use of alternative modes of transportation; providing convenient and adequate bicycling facilities; and enhancing pedestrian amenities through the provision of roof gardens and terraces, courtyards, paseos, and walkways, which would include accent paving, seating, and other landscape elements. As such, Alternative 4 would comply with the programs and policies set forth in the Mobility Plan, Plan for a Healthy Los Angeles, LAMC Section 12.21.A.16 and LAMC Section 12.26J, Citywide Design Guidelines, the Walkability Checklist, LADOT's Transportation Technology Strategy and Design Standards, SGAG RTP/SCS, Hollywood Community Plan, and the Redevelopment Plan to the same extent as the Project. As such, Alternative 4 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Thus, impacts would be similar to the less-than-significant impacts of the Project.

With respect to VMT, Alternative 4 does not include residential uses and would not result in any household VMT per capita. When accounting for the same project design features as the Project, the proposed uses would result in 21,916 total work VMT, which equates to an average work VMT per employee of 6.5.<sup>18</sup> As such, the average work VMT per employee for Alternative 4 would still fall below the significance threshold for the Central APC of 7.6.<sup>19</sup> Therefore, impacts with respect to conflicts with CEQA Guidelines

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<sup>18</sup> Gibson Transportation Consulting, Inc., "Vehicle Miles Traveled Analysis of Project Alternatives for the Sunset Gower Studios Preservation and Enhancement Plan Hollywood, California," February 13, 2020. See Appendix J of this Draft EIR.

<sup>19</sup> Gibson Transportation Consulting, Inc., "Vehicle Miles Traveled Analysis of Project Alternatives for the Sunset Gower Studios Preservation and Enhancement Plan Hollywood, California," February 13, 2020. See Appendix J of this Draft EIR.

Section 15064.3, subdivision (b) would be less than the less-than-significant impacts of the Project.

As with the Project, Alternative 4 would not introduce hazardous design features, so like the Project, no impact would occur. Lastly, similar to the Project, Alternative 4 would not interfere with emergency access; therefore, impacts would be less than significant.

## **k. Tribal Cultural Resources**

As previously discussed, Alternative 4 would involve similar grading and excavation activities as the Project. Therefore, the potential for Alternative 4 to uncover subsurface tribal cultural resources would be similar to that of the Project. As discussed in Section IV.J, Tribal Cultural Resources, of this Draft EIR, no known recorded tribal cultural resources have been identified within the Project Site or in the immediate vicinity of the Project Site. As such, like the Project, no impacts to tribal cultural resources would occur under Alternative 4 and impacts would be similar to the impacts of the Project.

## **l. Utilities and Service Systems**

### **(1) Water Supply and Infrastructure**

#### *(a) Construction*

Similar to the Project, construction activities associated with Alternative 4 would result in a temporary demand for water associated with dust control, equipment and site cleanup, excavation and export, soil compaction and earthwork, mixing and placement of concrete, irrigation for plant and landscaping establishment, testing of water connections and flushing, and other short-term related activities. This demand would be less than the Project since the amount of new construction and the construction duration required under Alternative 4 would be reduced. As evaluated in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of Project construction. Since the water demand for construction activities under Alternative 4 would be less than that of the Project, the temporary and intermittent demand for water during construction under Alternative 4 would also be expected to be met by the City's available water supplies. Similarly, the existing LADWP water infrastructure would be adequate to provide the water flow necessary to serve Alternative 4. Therefore, impacts on water supply and infrastructure associated with construction activities would be less than significant under Alternative 4 and less when compared to the less-than-significant impacts of the Project.

### *(b) Operation*

As with the Project, operation of Alternative 4 would generate an increased demand for water relative to existing conditions. However, based on the reduction in total floor area, water demand for Alternative 4 would be less than the Project's estimated increase in water demand. As with the project, the estimated net water demand under Alternative 4 would also be within the available and projected water supplies for LADWP under normal, single-dry, and multi-dry years through the year 2040. In addition, as with the Project, Alternative 4 would connect to the existing mains within the surrounding streets. As Alternative 4 would require similar fire flow requirements pursuant to the LAMC as the Project, it is assumed that sufficient infrastructure capacity would be available to provide fire water service to Alternative 4 and upgrades to the mainlines that serve the Project Site would not be required. Thus, operational impacts to water supply and infrastructure under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project.

## **(2) Wastewater**

### *(a) Construction*

Similar to the Project, construction activities for Alternative 4 would result in wastewater generation from construction workers on-site. However, as with the Project, portable restrooms and hand wash areas would be provided during construction, which would not contribute to wastewater flows to the City's wastewater system. Thus, wastewater generation from construction activities under Alternative 4 would not cause a measurable increase in wastewater flows.

As with the Project, Alternative 4 would not require or result in the construction of new wastewater treatment facilities or in the expansion of existing facilities. Like the Project, Alternative 4 would require construction activities associated with connecting on-site wastewater lines to the sewer mains adjacent to the Project Site in order to provide wastewater services to the proposed buildings. These construction activities would primarily be confined to trenching and would be limited to the on-site wastewater distribution as well as minor off-site work associated with connections to the public main. Therefore, construction-related impacts to the wastewater system under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

### *(b) Operation*

As with the Project, operation of Alternative 4 would generate greater wastewater flows relative to existing conditions. However, based on the reduction in total floor area, wastewater generation under Alternative 4 would be less than the Project's estimated wastewater flow. Thus, it can be reasonably concluded that since the Project's wastewater

flows would be accommodated by the existing infrastructure, the wastewater generated by Alternative 4 would also be accommodated by the existing capacity of any wastewater treatment plant, including the Hyperion Water Reclamation Plant, and impacts with respect to treatment capacity would be less than significant.

Similar to the Project, sewer service for Alternative 4 would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site. Given that wastewater flows generated by Alternative 4 would be less than the estimated wastewater flow of the Project, it is anticipated that there would be sufficient capacity within the sewer lines serving the Project Site to accommodate the flows from Alternative 4. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for Alternative 4 during the permitting process. In addition, sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Thus, operational impacts with regard to wastewater generation and infrastructure capacity under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project.

### (3) Energy and Telecommunication Infrastructure

#### *(a) Energy Infrastructure*

##### *(i) Construction*

As discussed above, Alternative 4 would reduce the amount of energy needed for construction activities based on the reduction in development. As discussed in Section IV.K.3, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR, the estimated energy usage of the Project during construction would be within the available capacity and supply of the existing infrastructure. Since Alternative 4 would generate a reduced demand for energy during construction compared to the Project, the energy demand of Alternative 4 would similarly be within the available capacity of the existing infrastructure. Therefore, impacts to energy infrastructure capacity would be less than significant and less when compared to the less-than-significant impacts of the Project.

##### *(ii) Operation*

As previously discussed, the total energy consumption of Alternative 4 would be less than that of the Project. Therefore, as with the Project, the existing energy infrastructure would similarly have capacity to support Alternative 4. Impacts related to energy infrastructure would be less than significant under Alternative 4 and less when compared to the less-than-significant impacts of the Project.

### *(b) Telecommunications Infrastructure*

With regard to telecommunication facilities, similar to the Project, Alternative 4 would require construction of new on-site telecommunications infrastructure to serve new buildings and potential upgrades and/or relocation of existing telecommunications infrastructure. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. However, as with the Project, a Construction Management Plan would be implemented during construction of Alternative 4 to ensure safe pedestrian access and vehicle travel throughout the construction period. In addition, when considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration (i.e., months) and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would primarily take place on-site, with minor off-site work associated with connections to the public system. As with the Project, no upgrades to off-site telecommunications systems are anticipated. In addition, any work that may affect services to the existing telecommunications lines would be coordinated with service providers. Thus, as with the Project, impacts related to telecommunications infrastructure would be less than significant under Alternative 4 and similar to the less-than-significant impacts of the Project.

## **3. Comparison of Impacts**

As analyzed above, while Alternative 4 would reduce the Project's significant and unavoidable impacts related to regional air quality emissions, construction-related on-site and off-site noise, and on-site construction vibration, Alternative 4 would not eliminate such impacts. In addition, Alternative 4 would not eliminate the Project's significant and unavoidable impact to historical resources. Alternative 4 also would not eliminate the Project's significant and unavoidable cumulative impacts related to air quality from regional construction emissions and off-site construction noise. The remaining impacts would be similar to, or less than, those of the Project.

## **4. Relationship of the Alternative to Project Objectives**

With a similar mix of uses as the Project, Alternative 4 would mostly meet the underlying purpose of the Project to provide television, video, and motion picture production facilities, while supporting the evolving needs of the entertainment industry for creative office space, enhanced post-production facilities, and other studio-related facilities. In addition, Alternative 4 would achieve the following Project objectives:

- Consistent with the objective of the General Plan to maintain significant historic and architectural resources and districts while allowing for the development of

economically viable uses, establish clear guidelines for the preservation of the historic character of the Project Site while providing an upgraded creative office space and production-supporting uses on the Project Site in a manner that respects and preserves the majority of identified historic resources and districts.

- Enhance an existing studio site along a transit corridor and within a high activity area where media and entertainment related uses are consolidated with production, post-production, and administrative offices in one site to promote sustainability and reduces vehicle miles traveled, with associated reductions in air quality and greenhouse gas emissions.
- 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.
- Provide adequate and safe parking that satisfies the unique demand of the entertainment industry with direct access to the proposed uses, including truck circulation and maintenance of the production “basecamp” to allow for the flexible and efficient staging of trucks and trailers needed for film and television productions, and to enhance efficiency and safety.

However, Alternative 4 would not meet the following objectives to the same extent as the Project due to the overall reduction in total floor area:

- Consistent with the objective of the Hollywood Community Plan to further the development of Hollywood as a major center of entertainment and to perpetuate its image as the international center of the motion picture industry, substantially enhance the existing studio/media-related office and office production uses within an existing studio campus to ensure continued viability of the studios.
- In support of the objective of the Hollywood Community Plan to promote economic well-being and public convenience through encouraging the revitalization of the motion picture industry, create a secure campus environment where media and entertainment related uses are consolidated with production, post-production, and administrative offices in order to maximize creativity and productivity.
- Design and construct economically-viable and new state-of-the-art and technologically advanced creative office and production support spaces with the integrated density, infrastructure, parking, and technology to attract high-quality media and creative office tenants to a key corridor in Hollywood and to meet the existing and anticipated future demand of the movie, television, and entertainment industry and to allow flexibility to incorporate future technology advances.

- Provide an enhanced studio campus environment that creates new media-related employment opportunities serving movie, television, and entertainment industries, as well as construction jobs, providing opportunities for local and regional economic growth for a rapidly growing neighborhood residential population and locate jobs on a site that is easily accessible through public transportation.

## **V. Alternatives**

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### **E. 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/No Build Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives.

With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible alternatives includes the No Project Alternative; the Preservation and Soundstage Alternative; the Reduced Excavation Alternative; and the Reduced Intensity Alternative. Table V-1 on page V-6 provides a comparative summary of the environmental impacts anticipated under each alternative with the environmental impacts associated with the Project. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to “avoid or substantially lessen one or more of the significant effects” of the Project.

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project Alternative would avoid all of the Project’s significant environmental impacts. However, the No Project Alternative would not meet any of the Project’s basic objectives.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that Alternative 2, the Preservation and Soundstage Alternative, would be the Environmentally Superior Alternative. As discussed above, while Alternative 2 would not eliminate the Project’s significant and unavoidable impacts with regard to regional construction emissions and on- and off-site construction noise, Alternative 2 would eliminate the Project’s significant and unavoidable impact with regard to historical resources. In addition, Alternative 2 would reduce many of the Project’s less-than-significant and less than significant with mitigation impacts compared to the other alternatives. Thus, of the range of alternatives analyzed, Alternative 2 would be the Environmentally Superior Alternative.