

Appendices

Appendix FEIR-1

Draft EIR Comment Letters

From: **Christine Asiata** <Christine.Asiata@opr.ca.gov>
Date: Wed, May 27, 2020 at 5:02 PM
Subject: SCH Number 2018021071
To: Jason McCrea <jason.mccrea@lacity.org>

Your project is published and is available for review. *Note:* the review ‘start’ and ‘end’ period.

Please use the “navigation” and select “published document” to view your project with attachments on CEQAnet.

NOTE: Closing Letters to Lead Agency: The State Clearinghouse (SCH) would like to inform you that our office will transition from providing close of review period acknowledgement on your CEQA environmental document, at this time. During the phase of not receiving notice on the close of review period, comments submitted by State Agencies at the close of review period (and after) are available on CEQAnet.

Please visit: <https://ceqanet.opr.ca.gov/Search/Advanced>

- Filter for the SCH# of your project **OR** your “Lead Agency”
 - If filtering by “Lead Agency”
 - Select the correct project
 - Only State Agency comments will be available in the “attachments” section: **bold and highlighted**

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DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
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PHONE (213) 897-0475
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*Making Conservation
a California Way of Life.*

July 6, 2020

Jason McCrea
City of Los Angeles
221 N. Figueroa Street
Los Angeles, CA 90012

RE: Sunset Gower Studios Enhancement Plan –
Draft Environmental Impact Report (DEIR)
GTS # 07-LA-2018-03271
SCH # 2018021071
Vic. LA-101/PM: 6.426

Dear Jason McCrea:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the above referenced DEIR. The Sunset Gower Studios Enhancement Plan involves the removal of 160,611 square feet of existing floor area and the construction of 627,957 square feet of new floor area, consisting of 599,335 square feet of creative office space and 27,172 square feet of production support space. Total net new proposed floor area is 467,346 square feet. Overall, the project would result in a total of 852,792 square feet of creative office space, 53,778 square feet of production support, 169,412 square feet of sound stages, and 6,516 square feet of restaurant space on the project site, with a total floor area of 1,083,948 square feet. The new uses would be within three buildings on a 15.9-acre portion of the site. When averaged over the 15.9-acre project site, the Floor Area Ratio of the project is 1.47:1. The project also includes the construction of up to 1,335 new parking spaces. The project site's existing 1,398 parking spaces would remain, meaning the site would have a total of 2,733 spaces. The City of Los Angeles is considered the Lead Agency under the California Environmental Quality Act (CEQA).

The project is located approximately 2,500 feet away from the United States 101 (US-101) on- and off-ramps at Sunset Boulevard. It is also located approximately 2,700 feet away from the intersection of Gower Street and State Route 2 (SR-2, also known as Santa Monica Boulevard).

Caltrans commented on the Notice of Preparation for this project in a letter dated March 27, 2018. Since then, in July 2019 the City of Los Angeles adopted a Vehicle Miles Traveled (VMT) metric for transportation analysis, in accordance with Senate Bill 743 (2013) as described in the DEIR. In addition, this month Caltrans released its updated VMT-focused Transportation Impact Study Guide. As such, Caltrans has reviewed this DEIR from a VMT perspective rather than a level of service perspective, and has the following comments.

Based on the City of Los Angeles' VMT calculator, the project would not result in a significant VMT impact, with or without the implementation of project design features such as a Transportation Demand Management (TDM) program, which should decrease VMT. Specifically, prior to the implementation of project design features, the project would generate an average work VMT per employee of 6.2, which falls below the significance threshold of 7.6 for the project's area. After the implementation of project design features, the project would generate an average work VMT per employee of 5.8, which still falls below the significance threshold of 7.6 for the project's area. Furthermore, cumulative impacts would also be less than significant because according to the 2018 State Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts in CEQA, "...a finding of a less-than-significant project impact would

imply a less than significant cumulative impact....” for a project that falls below an efficiency-based threshold, such as VMT per employee, and is aligned with long-term environmental goals and relevant plans. This project meets those criteria.

Despite the project’s less than significant impacts, the CEQA Analysis Memo included in Appendix J.1 states that in addition to implementing a TDM program, the project may also include “...contribution towards transportation systems management improvements within the study area, and specific intersection improvements.” Some of the transportation systems management (TSM) improvements that are included in the table on page 55 of Appendix J are proposed on US-101 and SR-2. Encroachment permits are required for any project work on or near Caltrans right of way. However, this decision will be subject to additional review by the Office of Permits. In the meantime, please provide Caltrans with a complete list and implementation dates of any TSM, TDM, or intersection improvements that will affect Caltrans intersections.

The following information is included for your consideration.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability. Furthermore, Caltrans encourages the Lead Agency to integrate transportation and land use in a way that reduces VMT and Greenhouse Gas (GHG) emissions, as well as facilitates a high level of non-motorized travel and transit use. Thus, Caltrans supports the TDM program that this project will implement. Additional TDM and complete streets strategies that the City of Los Angeles may want to consider integrating into this program include:

- Ensure that the amount of vehicle parking provided is no more than required. Consider reducing parking through providing additional bicycle or carpool spaces.
- Offer bicycle parking that is secure, convenient, and accessible.
- Provide a conveniently located on-site bicycle repair station.
- Increase the one-time fixed fee contribution to the City’s Bicycle Plan Trust, as Caltrans estimates that the current contribution of \$75,000 would only be able to fund an approximately $\frac{3}{4}$ mile long Class II bike lane.
- Confirm that project site driveways are designed to allow vehicle drivers to clearly see any approaching pedestrians or bicyclists at a safe sight-distance.

Also, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. Caltrans supports “...scheduling of haul truck and construction worker trips outside weekday peak traffic periods to the extent feasible” as stated in the Executive Summary. Since the truck haul route from the project site is anticipated to be Sunset Boulevard to the US-101, please submit the Construction Traffic Management Plan with details on potential delays from truck traffic on the US-101 for Caltrans’ review.

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at Emily.Gibson@dot.ca.gov, and refer to GTS# 07-LA-2018-03271.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

July 1, 2020

jason.mccrea@lacity.org

Jason McCrea, Staff Planner

City of Los Angeles, Planning Department

221 North Figueroa Street, Suite 1350

Los Angeles, CA 90012

Draft Environmental Impact Report (Draft EIR) for the Proposed Sunset Gower Studios Enhancement Project (SCH No.: 2018021071)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish 160,000 square feet of existing studio floor areas and construct three new office buildings totaling 693,432 square feet with subterranean parking on 15.9 acres (Proposed Project). The Proposed Project is located on the southwest corner of Sunset Boulevard and Gower Street in the community of Hollywood within the City of Los Angeles. Construction of the Proposed Project will depend on business needs but is anticipated to begin in or before 2024 and be completed in 2028¹. Based on Figure II: *Aerial Photograph of the Project Vicinity*, and a review of aerial photographs, South Coast AQMD staff found that the Proposed Project is surrounded by residential uses and is approximately 0.4 miles from Bernstein High School².

South Coast AQMD Staff's Summary of the Air Quality Analysis

In the Draft EIR, the Lead Agency quantified the Proposed Project's regional construction and operational emissions and compared those emissions to the South Coast AQMD's recommended air quality CEQA significance thresholds. The Lead Agency found that the Proposed Project's unmitigated regional construction air quality impacts would be significant for nitrogen oxides (NOx) at 261 pounds per day (lbs/day)³. The Lead Agency is committed to implementing Mitigation Measure AIR-MM-1, which requires that project representatives maintain a list of all off-road construction equipment and that off-road construction equipment shall meet Tier 4 Final where commercially available⁴. With implementation of AIR-MM-1, the Proposed Project's construction air quality impacts from NOx emissions would remain significant and unavoidable at 204 lbs/day⁵. The Lead Agency also quantified concurrent construction and operational emissions, compared the combined emissions to South Coast AQMD's air quality CEQA significance thresholds for operation, and found that the Proposed Project's overlapping construction and operational activities would result in significant and unavoidable air quality impacts for NOx emissions at 83 lbs/day⁶. The Proposed Project's localized construction and operational air quality impacts were found to be less than significant⁷.

¹ Draft EIR, Chapter II: Project Description, Page II-17.

² *Ibid.* Page II-4.

³ Draft EIR, Chapter IV.B, Air Quality, Page IV.B-51.

⁴ *Ibid.* Page IV. B-60 to 61.

⁵ *Ibid.*

⁶ *Ibid.* Page IV.B-64.

⁷ *Ibid.* Page IV.B-53 and IV.B-56.

Summary of South Coast AQMD Staff's Comments

Based on a review of the Draft EIR and supporting technical documents, South Coast AQMD staff has concerns about the Proposed Project's air quality analysis for construction, which have likely led to an under-estimation of the Proposed Project's construction emissions. First, the Lead Agency used a haul truck trip length of 25 miles (one-way) to quantify the Proposed Project's hauling emissions from soil export but did not discuss how this truck trip length was developed in the Draft EIR. South Coast AQMD recommends that the Lead Agency provide additional information in the Final EIR as substantial evidence to support that the use of 25 miles is appropriate and will not result in an under-estimation of construction emissions from haul truck trips. Second, according to AIR-MM-1, the Lead Agency will use Tier 4 Final construction equipment when it is commercially available. However, the Lead Agency quantified the Proposed Project's mitigated construction emissions based on an assumption that Tier 4 Final construction equipment will be used, not when it is commercially available⁸. Therefore, the assumption used to calculate the mitigated construction emissions in the Draft EIR was not consistent with the air quality mitigation requirement in AIR-MM-1. Third, the Proposed Project's regional construction NOx emissions would be contributed by on-road and off-road construction equipment. While the Lead Agency included an air quality mitigation measure to reduce emissions from the use of off-road construction equipment, it did not include a mitigation measure to reduce on-road construction trucks emissions. Since the Proposed Project's construction air quality impacts, particularly from NOx emissions, would be significant and unavoidable, South Coast AQMD staff recommends that the Lead Agency require the use of zero-emissions, near-zero emissions, or at a minimum, 2010 model year heavy-duty haul trucks during construction. Please see the attachment for more information.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. Further, if the Lead Agency makes the findings that the recommended new mitigation measure is not feasible, the Lead Agency should describe the specific reasons supported by substantial evidence for rejecting it in the Final EIR (CEQA Guidelines Section 15091).

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Margaret Isied, Assistant Air Quality Specialist, at misied@aqmd.gov if you have questions or wish to discuss the comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:MI

LAC200521-02

Control Number

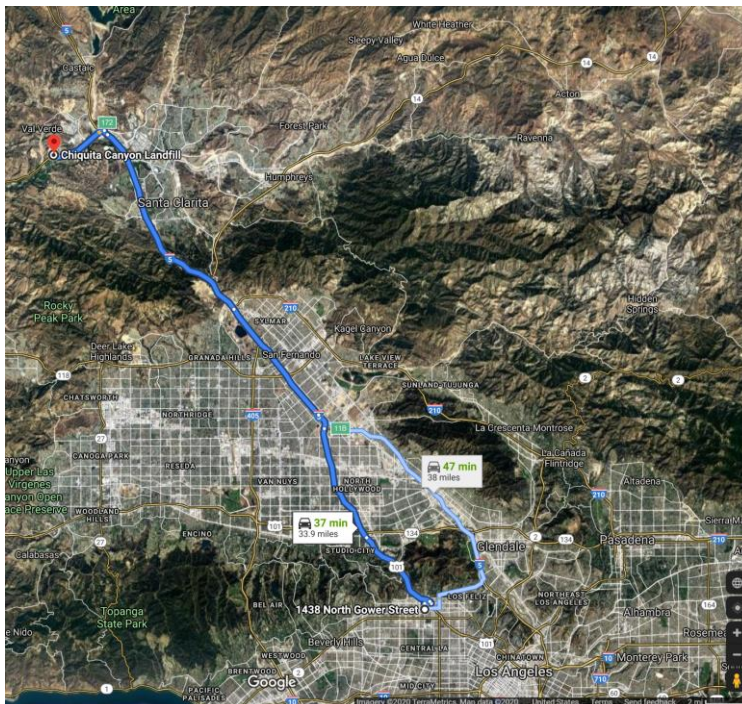
⁸ Draft EIR, Appendix B, Technical Appendix for Air Quality and Greenhouse Gas Emissions. CalEEMod Winter Run, User Entered Comments and non-default data, PDF Pages 35-38.

ATTACHMENT

1. Construction Air Quality Impact Analysis

Based on a review of the Draft EIR and the Air Quality and Greenhouse Gas Analysis Technical Appendix, South Coast AQMD staff found that the Lead Agency used a haul truck trip length of 25 miles (one way)⁹ to quantify the Proposed Project's hauling emissions from soil export. In the Transportation Appendix to the Draft EIR, the Lead Agency stated that haul trucks will travel from the Proposed Project to the Chiquita Landfill via U.S. State Route 101 and Interstate 5 (I-5)¹⁰. However, the Draft EIR and supporting technical appendices, the Lead Agency did not discuss how the haul truck trip length of 25 miles (one way) was developed. As shown in Figure 1, South Coast AQMD staff estimated the haul truck trip length of 33.9 miles (one-way) between the Proposed Project and the Chiquita Landfill via U.S. Route 101 and I-5. The Lead Agency estimated that the peak truck activity at the Proposed Project would occur during the excavation and grading phases and would require up to 314 truck trips a day¹¹. Using a one-way haul truck trip length of 25 miles likely underestimated the Proposed Project's construction emissions, particularly NO_x emissions, from haul truck trips for soil export. Therefore, South Coast AQMD staff recommends that the Lead Agency provide additional information in the Final EIR as substantial evidence to support the use of 25 miles (one-way). Alternatively, to conservatively analyze a worst-case construction impact scenario, the Lead Agency should re-calculate the Proposed Project's construction emissions from haul truck trips based on a 33.9-mile, one-way trip length. If the Lead Agency finds, after the revisions, that the Proposed Project's construction emissions would be significant, mitigation measures to reduce hauling emissions will be required (CEQA Guidelines Section 15126.4). (Also see Comment No. 3).

**Figure 1: South Coast AQMD Staff's Estimated Haul Truck Trip Distance
based on the Haul Route in the Draft EIR**



Source: South Coast AQMD Staff. Generated June 24, 2020. Google Maps.

⁹ *Ibid.* CalEEMod Vehicle Miles Traveled. PDF Page 121.

¹⁰ *Ibid.* Appendix J: Transportation Appendix. Page 139.

¹¹ *Ibid.* Page 138.

2. **Air Quality Mitigation Measure (AIR-MM-1)**

In the Draft EIR, the Lead Agency is committed to using Tier 4 Final construction equipment only when it is commercially available (AIR-MM-1)¹². In the Air Quality and Greenhouse Gas Technical Appendix, the Lead Agency discussed low availability of Tier 4 Final construction equipment and number of construction projects ongoing and expected to be ongoing¹³ as reasons to support that Tier 4 construction equipment will likely not be available for use at the Proposed Project. However, based on a review of the CalEEMod output files for the Proposed Project, South Coast AQMD staff found that the Lead Agency calculated the Proposed Project's mitigated construction emissions assuming that Tier 4 Final construction equipment will be used, not based on the commercial availability. It is not appropriate to rely on emissions reductions from using Tier 4 Final construction equipment to calculate the Proposed Project's mitigated construction emissions when the commitment is to use such equipment when it is commercially available. Therefore, to be consistent with the mitigation measure requirement in AIR-MM-1 in the Draft EIR, the Lead Agency should re-calculate the Proposed Project's mitigated construction emissions based on the use of Tier 4 Interim or Tier 3 construction equipment.

3. **Additional Recommended Construction Air Quality Mitigation Measure for Mobile Sources**

In the Draft EIR, the Lead Agency considered the use of diesel trucks meeting 2007 or 2010 model year engine standards, but concluded that those trucks are low in availability because according to the statewide emissions inventories of on-road mobile sources (EMFAC2017) 2010 model year trucks are accounted for approximately 50 percent of the truck population¹⁴. Additionally, the Lead Agency indicated that "concrete delivery activities at the Proposed Project typically rely on a mix of small independent contractors and a few companies with large fleets¹⁵." Therefore, the Lead Agency would not require the use of 2007 or 2010 model truck as an air quality mitigation measure.

South Coast AQMD staff is concerned with the Lead Agency's reasoning for not requiring the use of 2010 model year trucks. CEQA defines feasible to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors" (California Public Resources Code Section 21061.1 and CEQA Guidelines Section 15364). Although the Lead Agency discussed reasons for not requiring the use of 2007 or 2010 model year trucks in the Draft EIR, those reasons were conclusory and not specific to the Proposed Project (e.g., based on a model assumption from statewide emissions inventories of on-road mobile sources). Therefore, the Lead Agency's assessment in the Draft EIR lacked enough substantial evidence to support that using clean trucks will not be feasible for the Proposed Project to implement after considering the economic, environmental, legal, social, and technological factors.

The California Air Resources Board (CARB) adopted the statewide Truck and Bus Regulation (Regulation) in 2010. The Regulation requires, among others, that diesel trucks and buses that operate in California to have 2010 model year engines or equivalent by January 1, 2023¹⁶. Not only this Regulation establishes economic, environmental, legal, social, and technological feasibility, it also provides an opportunity for projects such as the Proposed Project to use 2010 model year trucks. As stated above, construction of the Proposed Project could begin in or before 2024, with full buildout anticipated by 2028. The Proposed Project will need to comply with the Regulation by using 2010 model year trucks, which should become more widely available commercially. The Lead Agency should use this Proposed Project as an opportunity to take early actions to incentivize the use of 2010 model year trucks or newer. This can and should facilitate the Proposed Project's transition to using 2010 model year trucks, provides

¹² *Ibid.*

¹³ Draft EIR. Appendix B: Technical Appendix for Air Quality and Greenhouse Gas Emissions. Page 16.

¹⁴ *Ibid.*

¹⁵ *Ibid.* Page 17.

¹⁶ More information on the CARB's Truck and Bus Regulations is available at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.html>.

time and opportunities to resolve any implementation challenges before the commencement of construction activities, and yields earlier emissions reductions from fleets.

Lead Agencies should not approve projects as proposed if there are feasible alternatives or mitigation measures available which would substantially lessen the significant environment effects of a project (California Public Resources Code Section 21002 and CEQA Guidelines Section 15126.4). The mitigation measure must be roughly proportional to the impacts of the project (CEQA Guidelines Section 15126.4(a)(4)(B)). The Proposed Project's regional construction NOx emissions would be contributed by both on-road and off-road construction equipment. While the Lead Agency included an air quality mitigation measure (MM-AIR-1) to reduce emissions from the use of off-road construction equipment, it did not include a mitigation measure to reduce on-road construction trucks emissions. In fact, the regional construction NOx emissions would remain significant and unavoidable at 204 lbs/day¹⁷. During the mat foundation (Building A, Parking Structure) phase, 1,148 truck trips per day would be required, and those truck trips would contribute approximately 66 percent of the total construction NOx emissions (134.61 lbs/day out of 204 lbs/day)¹⁸. Therefore, to reduce the Proposed Project's significant construction emissions from on-road construction trucks, the Lead Agency should include an air quality mitigation measure as follows in the Final EIR to require the use of clean trucks; otherwise, the Lead Agency has not met the CEQA requirement for mitigation measures.

- a) Require the use of zero-emissions (ZE) or near-zero emissions (NZE) for vendor trucks during construction, such as trucks with natural gas engines that meet the CARB's adopted optional NOx emission standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, require that truck operator(s)/construction contractor(s) commit to using 2010 model year or newer engines that meet CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. To monitor and ensure ZE, NZE, or 2010 model year or newer trucks are used at the Proposed Project, the Lead Agency should require that truck operator(s)/construction contractor(s) maintain records of all trucks associated with the Proposed Project's construction and make these records available to the Lead Agency upon request. Alternatively, the Lead Agency should require periodic reporting and provision of written records by truck operator(s)/construction contractor(s) and conduct regular inspections of the records to the maximum extent feasible and practicable.

Technology is transforming the transportation sector at a rapid pace. Cleaner trucks such as ZE or NZE trucks are increasingly more feasible and commercially available as technology advances. If using ZE or NZE trucks as a mitigation measure to reduce the Proposed Project's construction air quality impacts is not feasible today, cleaner trucks could become feasible in a reasonable period of time (CEQA Guidelines Section 15364). Therefore, it is recommended that the Lead Agency develop a process with performance standards to deploy the lowest emission technologies and incentivize the use of ZE or NZE heavy-duty trucks during construction (CEQA Guidelines Section 15126.4(a)). To facilitate the deployment and as part of the incentive programs, the Lead Agency can and should develop the performance standards as follows or any other comparable standards in the Final EIR.

- Develop a minimum amount of ZE or NZE heavy-duty trucks that the Proposed Project must use during each year of construction to ensure adequate progress. Include this requirement in the Proposed Project's construction bid documents.
- Establish a construction contractor(s)/truck operator(s) selection policy that prefers construction contractor(s)/truck operator(s) who can supply ZE or NZE heavy-duty trucks.

¹⁷ Draft EIR, Chapter IV.B: Air Quality, Page IV.B-61)

¹⁸ *Ibid.* Appendix B: Technical Appendix for Air Quality and Greenhouse Gas Emissions, Page 43.

- Include this policy in the Request for Proposal for selecting construction contractor(s)/truck operator(s).
- Develop a target-focused and performance-based process and timeline to review the feasibility to implement the use of ZE or NZE heavy-duty trucks during the four-year construction period.
 - Develop a project-specific process and criteria for periodically assessing progress in implementing the use of ZE or NZE heavy-duty trucks during the four-year construction period.

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

DATE: June 11, 2020

TO: Vincent P. Bertoni, Director of Planning
Department of City Planning

Attn: Jason McCrea, City Planner
Department of City Planning

FROM: Ali Poosti, Division Manager
Wastewater Engineering Services Division
LA Sanitation and Environment

SUBJECT: SUNSET GOWER STUDIOS ENHANCEMENT PLAN-NOTICE OF COMPLETION AND AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT

This is in response to your May 21, 2020 letter requesting a review of the proposed studio related creative office, production office/production support project located at 6010,6050 and 6060 Sunset Boulevard, 1455 N. Beachwood Drive, 1455 Gordon Street. 1438 and 1440 N Gower Street , Los Angeles, 90028. The project will consist of creative office and production support. LA Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project.

WASTEWATER REQUIREMENT

LA Sanitation, Wastewater Engineering Services Division (WESD) is charged with the task of evaluating the local sewer conditions and to determine if available wastewater capacity exists for future developments. The evaluation will determine cumulative sewer impacts and guide the planning process for any future sewer improvement projects needed to provide future capacity as the City grows and develops.

Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
<i>Existing</i>			
Creative Office	50 GPD/1000 SQ.FT	125,521 SQ.FT	(6,276)
Production Support	50 GPD/1000 SQ.FT	29,444 SQ.FT	(1,472)
Sound Stages	50 GPD/1000 SQ.FT	5,646 SQ.FT	(282)
Total Existing			(8,030)
<i>Proposed</i>			
Creative Office	170 GPD/1000 SQ.FT	599,335 SQ.FT	101,887
Production Support	170 GPD/1000 SQ.FT	27,172 SQ.FT	4,619
Total Proposed			106,506
Total Discharge			98,476 GPD

SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes an existing 6-inch line on Beachwood Ave R/W. The sewage from the existing 6-inch line feeds into an 18-inch line on Vine St, then into a 24-inch line on Melrose Ave before discharging into a 30-inch sewer line on Melrose Ave. Figure 1 shows the details of the sewer system within the vicinity of the project. The current flow level (d/D) in the 6-inch line cannot be determined at this time without additional gauging.

The current approximate flow level (d/D) and the design capacities at d/D of 50% in the sewer system are as follows:

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
6	Beachwood Ave R/W.	*	258,644 GPD
15	Eleanor Ave.	35	1.78 MGD
18	Vine St.	18	1.41 MGD
18	Vine St.	25	1.26 MGD
24	Melrose Ave.	11	3.04 MGD
27	Melrose Ave.	25	5.88 MGD
30	Melrose Ave.	22	8.88MGD

* No gauging available

Based on estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project. Further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer lacks sufficient capacity, then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at the time. Ultimately, this sewage flow will be conveyed to the Hyperion Water Reclamation Plant, which has sufficient capacity for the project.

All sanitary wastewater ejectors and fire tank overflow ejectors shall be designed, operated, and maintained as separate systems. All sanitary wastewater ejectors with ejection rates greater than 30 GPM shall be reviewed and must be approved by LASAN WESD staff prior to other City plan check approvals. Lateral connection of development shall adhere to Bureau of Engineering Sewer Design Manual Section F 480.

If you have any questions, please call Christopher DeMonbrun at (323) 342-1567 or email at chris.demonbrun@lacity.org.

STORMWATER REQUIREMENTS

LA Sanitation, Stormwater Program is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within the City of Los Angeles. We anticipate the following requirements would apply for this project.

POST-CONSTRUCTION MITIGATION REQUIREMENTS

In accordance with the Municipal Separate Storm Sewer (MS4) National Pollutant Discharge Elimination System (NPDES) Permit (Order No. R4-2012-0175, NPDES No. CAS004001) and the City of Los Angeles Stormwater and Urban Runoff Pollution Control requirements (Chapter VI, Article 4.4, of the Los Angeles Municipal Code), the Project shall comply with all mandatory provisions to the Stormwater Pollution Control Measures for Development Planning (also known as Low Impact Development [LID] Ordinance). Prior to issuance of grading or building permits, the applicant shall submit a LID Plan to the City of Los Angeles, Public Works, LA Sanitation, Stormwater Program for review and approval. The LID Plan shall be prepared consistent with the requirements of the Planning and Land Development Handbook for Low Impact Development.

Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant documents can be found at: www.lacitysan.org. It is advised that input regarding LID requirements be received in the preliminary design phases of the project from plan-checking staff. Additional information regarding LID requirements can be found at: www.lacitysan.org or by visiting the stormwater public counter at 201 N. Figueroa, 2nd Fl, Suite 280.

GREEN STREETS

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-way to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways and can be implemented in conjunction with the LID requirements. Green Street standard plans can be found at: www.eng2.lacity.org/techdocs/stdplans/

CONSTRUCTION REQUIREMENTS

All construction sites are required to implement a minimum set of BMPs for erosion control, sediment control, non-stormwater management, and waste management. In addition, construction sites with active grading permits are required to prepare and implement a Wet Weather Erosion Control Plan during the rainy season between October 1 and April 15.

Construction sites that disturb more than one-acre of land are subject to the NPDES Construction General Permit issued by the State of California, and are required to prepare, submit, and implement the Storm Water Pollution Prevention Plan (SWPPP).

If there are questions regarding the stormwater requirements, please call WPP's plan-checking counter at (213) 482-7066. WPD's plan-checking counter can also be visited at 201 N. Figueroa, 2nd Fl, Suite 280.

GROUNDWATER DEWATERING REUSE OPTIONS

The Los Angeles Department of Water and Power (LADWP) is charged with the task of supplying water and power to the residents and businesses in the City of Los Angeles. One of the sources of water includes groundwater. The majority of groundwater in the City of Los Angeles is adjudicated, and the rights of which are owned and managed by various parties. Extraction of groundwater within the City from any depth by law requires metering and regular reporting to the appropriate Court-appointed Watermaster. LADWP facilitates this reporting process, and may assess and collect associated fees for the usage of the City's water rights. The party performing the dewatering should inform the property owners about the reporting requirement and associated usage fees.

On April 22, 2016 the City of Los Angeles Council passed Ordinance 184248 amending the City of Los Angeles Building Code, requiring developers to consider beneficial reuse of groundwater as a conservation measure and alternative to the common practice of discharging groundwater to the storm drain (SEC. 99.04.305.4). It reads as follows: "Where groundwater is being extracted and discharged, a system for onsite reuse of the groundwater, shall be developed and constructed. Alternatively, the groundwater may be discharged to the sewer."

Groundwater may be beneficially used as landscape irrigation, cooling tower make-up, and construction (dust control, concrete mixing, soil compaction, etc.). Different applications may require various levels of treatment ranging from chemical additives to filtration systems. When onsite reuse is not available the groundwater may be discharged to the sewer system. This allows the water to be potentially reused as recycled water once it has been treated at a water reclamation plant. If groundwater is discharged into the storm drain it offers no potential for reuse. The onsite beneficial reuse of groundwater can reduce or eliminate costs associated with sewer and storm drain permitting and monitoring. Opting for onsite reuse or discharge to the sewer system are the preferred methods for disposing of groundwater.

To help offset costs of water conservation and reuse systems, LADWP offers Technical Assistance Program (TAP), which provides engineering and technical assistance for qualified projects. Financial incentives are also available. Currently, LADWP provides an incentive of \$1.75 for every 1,000 gallons of water saved during the first two years of a five-year conservation project. Conservation projects that last 10 years are eligible to receive the incentive during the first four years. Other water conservation assistance programs may be available from Metropolitan Water District of Southern California. To learn more about available water

conservation assistance programs, please contact LADWP Rebate Programs 1-888-376-3314 and LADWP TAP 1-800-544-4498, selection “3”.

For more information related to beneficial reuse of groundwater, please contact Greg Reed, Manager of Water Rights and Groundwater Management, at (213)367-2117 or greg.reed@ladwp.com.

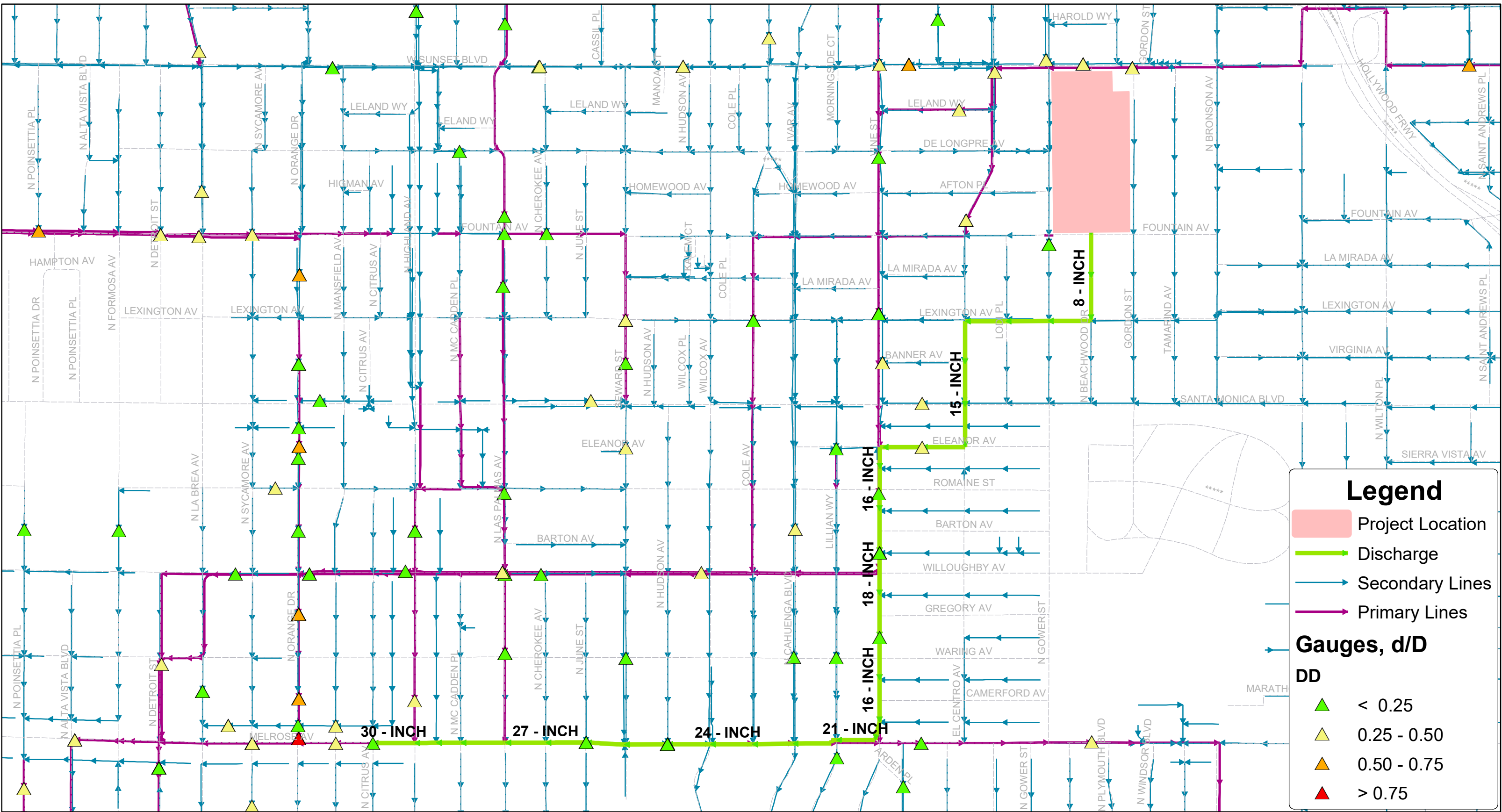
SOLID RESOURCE REQUIREMENTS

The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact LA Sanitation Solid Resources Recycling hotline 213-922-8300.

CD/AP: sa

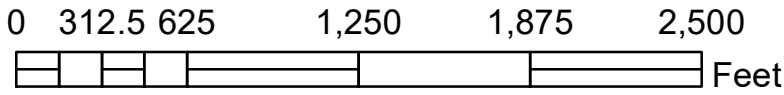
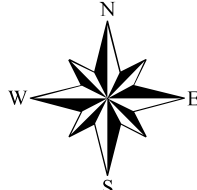
Attachment: Figure 1 - Sewer Map

c: Shahram Kharaghani, LASAN
Michael Scaduto, LASAN
Wing Tam, LASAN
Christopher DeMonbrun, LASAN



Wastewater Engineering Services Division
Bureau of Sanitation
City of Los Angeles

Figure 1
Sunset Grower Studios Enhancement Plan
Sewer Map





LOS ANGELES
CONSERVANCY

523 West Sixth Street, Suite 826
Los Angeles, CA 90014

213 623 2489 OFFICE
213 623 3909 FAX
laconservancy.org

July 10, 2020

Sent Electronically

Mr. Jason McCrea
Los Angeles City Planning
221 N. Figueroa Street Room 1350
Los Angeles, CA 90012
Email: Jason.mccrea@lacity.org

**RE: Sunset Gower Studios Enhancement Plan,
ENV-2017-5091-EIR**

Dear Mr. McCrea:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Sunset Gower Studios Enhancement Plan. As stated in the Draft EIR the proposed project will significantly impact the Sunset Gower Studios potential historic district and demolish 6050 Sunset Boulevard, an individually eligible historic resource. Based on outreach to the project applicant, Hudson Pacific Properties, the Conservancy understands Alternative 2: Preservation and Soundstage Alternative will be selected as the preferred project which the Conservancy fully supports. Unlike the proposed project in the Draft EIR, Alternative 2 will not result in any significant impacts to cultural resources.

The Conservancy greatly appreciates the efforts of the project team to fully consider the range of potential impacts when planning to incorporate new construction into a potential historic district. Not only is it important to maintain this production studio heritage of Hollywood but also to ensure this studio continues to maintain its vital role and function as a production facility for the future. Therefore we acknowledge Hudson Pacific Properties for working hard to create a viable studio for 21st century motion picture industry needs, while further reinforcing the important legacy of pioneering studios in Hollywood.



Proposed project will have significant and unavoidable impacts to the historic district

The potential Sunset Gower Studios Historic District has a period of significance from 1918, when the property was first developed by William Horsley, to 1958, when Harry Cohn, the pioneering president of Columbia Pictures died.

The potential district contains thirty-five buildings within its boundaries. Of the thirty-five, twenty-two buildings are identified as contributors. As currently included in the Draft EIR with the proposed project, six contributing buildings will be demolished to construct Buildings A, B, C and a parking structure. The cumulative loss to the district will be twenty-seven percent, a percentage that the Historic Resources Group has found to be a significant loss.

In addition to the loss of potential district contributors, 6050 Sunset Boulevard, an individually eligible resource will be demolished to construct Building A. Iconic music producer Bill Putnam opened his recording studio at 6050 Sunset in 1959. The studio quickly became one of the world's most popular recording spaces. Legendary artists such as Nat King Cole, Dean Martin, Bing Crosby, Jonny Mathis, Jan and Dean, The Righteous Brothers, Bobby Darin, Ray Charles, and Sammy Davis, Jr. all recorded at the studio. When Putnam's health began to fail in the 1970s, he sold the studio to his protégé, Allen Sides who continued operating the studio. No other music recording studio has won more technical excellence awards or garnered as many Best Engineered Grammys as the United-Western Records facility at 6050 Sunset.

1. Alternative 2: Preservation and Soundstage Alternative is a feasible alternative meeting project objectives while reducing significant impacts

As stated in the Draft EIR, Alternative 2: Preservation and Soundstage Alternative is deemed the environmentally superior alternative. This alternative successfully meets the project goals while minimally reducing the total net developed square footage by 8,015 square feet, or 1%.

Further, Alternative 2 preserves additional contributing resources within the potential historic district as well as the historic building located at 6050 Sunset. By relocating 6050 into the interior of the studio lot, it can be preserved and maintain its eligibility as a historic resource. Our understanding is the intact recording studio interior will also be maintained and preserved as part of this building's relocation.

As stated earlier, we understand Alternative 2 is intended to be selected as the preferred project and shall be included within the Final EIR. Overall this alternative and modified preferred project reflects the commitment by Hudson Pacific Properties to listen to the preservation community and work collaboratively to develop a plan that successfully incorporates new construction into an historic environment.



2. List the Sunset Gower Studio Historic District in the National Register of Historic Places and California Register of Historical Resources

The Conservancy strongly encourages the applicant to list the Sunset Gower Studios potential historic district in the National Register of Historic Places and California Register of Historical Resources (NRHP/CRHR) for its significance in the development of Los Angeles's early motion picture industry. Sunset Gower is an intact example of an early motion picture industry and is directly associated with Columbia Studios, one of the most influential film studios and one of Hollywood's "Big Eight" from the Golden Age of film. We recommend this commitment be made a condition as part of the Final EIR approval and certification process, and occurring prior to the issuance of any certificate of occupancy permit approval.

3. Designate 6050 Sunset Boulevard, 1455 Gordon Street (Alley Cat Studio), and 1440 Gower Street (Building 35) as City of Los Angeles Historic-Cultural Monuments (HCM)

We also strongly encourage the applicant to locally designate the three identified potentially eligible individual resources within and immediately adjacent to the project area. These buildings include 6050 Sunset Boulevard, 1455 Gordon Street (Alley Cat Studio), and 1440 Gower Street (Building 35). Both 6050 Sunset and 1440 Gower are set within the potential historic district boundaries, and 1455 Gower is immediately adjacent and under the same Hudson Pacific Properties ownership.

Each of these buildings is individually significant and thus should be afforded protection and a design review process for the future. Building 35 in particular is highly significant as a later contribution to the historic district dating to 1951, and directly associated with Columbia Pictures as their administrative headquarters. As with the NRHR/CRHP district listing, we recommend these individual designations be required as a condition for certificate of occupancy permit approval.

4. Conclusion

In conclusion, the Conservancy does not support the proposed Sunset Gower Studios Enhancement Plan Project as presented in the Draft EIR, however we do fully support Alternative 2: Preservation and Soundstage Alternative. This is a "win-win" solution that successfully reduces project impacts to historic resources to a less than significant level while still meeting project objectives. Furthermore, we urge the applicant to list the Sunset Gower Studios Historic District in the National Register and California Register, and to locally designate 6050 Sunset Boulevard, 1455 Gordon Street, and 1440 Gower Street. As part of the Final EIR, designation of these resources shall be made a condition for acquiring certificate of occupancy permit approval.



The Conservancy greatly appreciates the proactive steps taken by Hudson Pacific Properties to incorporate necessary new construction into this important historic setting. Such efforts reflect the applicants commitment to stewardship of Hollywood's significant motion picture legacy.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 6,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.

Sincerely,



Adrian Scott Fine
Director of Advocacy

cc: CD 13 Mitch O'Farrell





Jason McCrea <jason.mccrea@lacity.org>

Sunset- Gower Project

Myers, Robyn <rmyers@lapl.org>
To: jason.mccrea@lacity.org

Thu, Jul 16, 2020 at 4:44 PM

The Library Department response is attached. Please contact me if you have any questions.

—
Robyn Myers
Management Analyst
Facilities & Events Management
Los Angeles Public Library
630 W. Fifth St., Los Angeles, CA 90071
213-359-0105
rmyers@lapl.org
 Facebook Twitter Instagram Snapchat

Sunset Gower (1).docx
25K

Sunset Gower Studios Enhancement Plan
Request for Information
Los Angeles Public Library Response
July 15,2020

This Project would be served by the following branches:

Cahuenga Branch Library
4591 Santa Monica Blvd
Los Angeles, 90029

Francis Howard Goldwyn Hollywood Regional Library
1623 N. Ivar Av
Hollywood , 90028

Los Feliz Branch Library
1874 Hillhurst Av
Los Angeles ,90027

Will & Ariel Durant Branch Library
7140 W. Sunset Bl
Los Angeles, 90046

Detailed information regarding each branch is attached.

There are no current plans to build new libraries that would serve this project area.

On February 8, 2007, The Board of Library Commissioners approved a new Branch Facilities Plan. This Plan includes criteria for new Libraries, which recommends new size standards for the provision of LAPL facilities — 12,500 Square feet for community with less than 45,000 population and 14,500 square feet for community with more than 45,000 population and up to 20,000 square feet for a Regional branch. It also recommends that when a community reaches a population of 90,000, an additional branch library should be considered for the area.

Location Name and Address

Cahuenga Branch Library
4591 Santa Monica Blvd
Los Angeles, 90029

Size of facility in Square feet

10,942

Collection size

35,484

Annual Circulation

56,596

Staffing level

9.0 FTE

Volunteers

52

Service Population

48,435

The City of Los Angeles makes no predictions on future population statistics

The branch has a community room that is used by the community for public programs. This library has extensive Russian and Ukrainian collections as well as materials in English and Spanish. They also have a Literacy Center available to the public.

All libraries provide free access to computer workstations which are connected to the Library's information network. In addition to providing Internet access, these workstations enable the public to search LAPL's many electronic resources including the online catalog, subscription databases, word processing, language learning, literacy and a large historic document and photograph collection.

All libraries have:

Free Public Wi-Fi

Wireless & Mobile Printing

Reserve a Public Computer

Location Name and address

Los Feliz Branch Library
1874 Hillhurst Av
Los Angeles ,90027

Size of facility in Square feet

10,449

Collection size

49,535

Annual Circulation

131,101

Staffing level

10FTE

Volunteers

45

Service Population

44,639

The City of Los Angeles makes no predictions on future population statistics

The branch has a community room that is used by the community for public programs. This library has small collections in Armenian, Korean and French, as well as materials in English and Spanish. They also have a "Los Feliz in Literature" collection. They are also home to the Leonardo DiCaprio Computer Center

All libraries provide free access to computer workstations which are connected to the Library's information network. In addition to providing Internet access, these workstations enable the public to search LAPL's many electronic resources including the online catalog, subscription databases, word processing, language learning, literacy and a large historic document and photograph collection.

All libraries have:

Free Public Wi-Fi

Wireless & Mobile Printing

Reserve a Public Computer

Location Name and Address

Francis Howard Goldwyn Hollywood Regional Library
1623 N. Ivar Av
Hollywood , 90028

Size of facility in Square feet

19,000

Collection size

74,774

Annual Circulation

55,084

Staffing level

15.5 FTE

Volunteers

10

Service Population

78,944

The City of Los Angeles makes no predictions on future population statistics

The branch has a community room that is used by the community for public programs. This library has a large collection of rare Hollywood memorabilia, as well as materials in English and Spanish.

All libraries provide free access to computer workstations which are connected to the Library's information network. In addition to providing Internet access, these workstations enable the public to search LAPL's many electronic resources including the online catalog, subscription databases, word processing, language learning, literacy and a large historic document and photograph collection.

All libraries have:

Free Public Wi-Fi

Wireless & Mobile Printing

Reserve a Public Computer

Location Name and Address

Will & Ariel Durant Branch Library
7140 W. Sunset Bl
Los Angeles, 90046

Size of facility in Square feet

12,500

Collection size

54,632

Annual Circulation

71,983

Staffing level

9.5 FTE

Volunteers

8

Service Population

25,657

The City of Los Angeles makes no predictions on future population statistics

The branch has a community room that is used by the community for public programs. This library has Russian collection and provides service in Russian They have materials in English and Spanish. They also host "The Source" a service to assist the local homeless community on a monthly basis.

All libraries provide free access to computer workstations which are connected to the Library's information network. In addition to providing Internet access, these workstations enable the public to search LAPL's many electronic resources including the online catalog, subscription databases, word processing, language learning, literacy and a large historic document and photograph collection.

All libraries have:

Free Public Wi-Fi

Wireless & Mobile Printing

Reserve a Public Computer

Los Angeles Unified School District

Office of Environmental Health and Safety

AUSTIN BEUTNER
Superintendent of Schools

CARLOS A. TORRES
Director, Environmental Health and Safety

JENNIFER FLORES
Deputy Director, Environmental Health and Safety

June 1, 2020

Jason McCrea
Los Angeles Department of City Planning
221 N Figueroa Street, Suite 1350
Los Angeles, CA 90012

PROJECT LOCATION: 6010, 6050 and 6060 Sunset Boulevard, 1455 North Beachwood Drive, 1455 Gordon Street, and 1438 and 1440 North Gower Street, Los Angeles, CA 90028
CASE NUMBER: ENV-2017-5091-EIR

Presented below are comments submitted on behalf of the Los Angeles Unified School District (LAUSD) regarding the Draft Environmental Impact Report for the project located on 6010, 6050 and 6060 Sunset Boulevard, 1455 North Beachwood Drive, 1455 Gordon Street, and 1438 and 1440 North Gower Street. LAUSD is concerned about the potential negative impacts of the project on our students, staff and parents traveling to and from Le Conte Middle School (MS), since the project located at 6010, 6050 and 6060 Sunset Boulevard, 1455 North Beachwood Drive, 1455 Gordon Street, and 1438 and 1440 North Gower Street is about 750 feet west of the school.

Based on the extent/location of the proposed development, it is our opinion that environmental impacts on the surrounding community (traffic, pedestrian safety) may occur. Since the project may have an environmental impact on LAUSD schools, recommended conditions designed to help reduce or eliminate potential impacts are included in this response.

Traffic/Transportation

LAUSD's Transportation Branch **must be contacted** at (213) 580-2950 regarding the potential impact upon existing school bus routes. The Project Manager or designee will have to notify the LAUSD Transportation Branch of the expected start and ending dates for various portions of the project that may affect traffic within nearby school areas. To ensure that effective conditions are employed to reduce construction and operation related transportation impacts on District sites, including the net increase of 1000 or more daily vehicle trips, we ask that the following language be included in the recommended conditions for traffic impacts:

- School buses must have unrestricted access to schools.
- During the construction phase, truck traffic and construction vehicles may not cause traffic delays for our transported students.
- During and after construction changed traffic patterns, lane adjustment, traffic light patterns, and altered bus stops may not affect school buses' on-time performance and passenger safety.
- Construction trucks and other vehicles are required to stop when encountering school buses using red-flashing-lights must-stop-indicators per the California Vehicle Code.

333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017 • Telephone (213) 241-3199 • Fax (213) 241-6816

The Office of Environmental Health and Safety is dedicated to providing a safe and healthy environment for the students and employees of the Los Angeles Unified School District.

- Contractors must install and maintain appropriate traffic controls (signs and signals) to ensure vehicular safety.
- Contractors must maintain ongoing communication with LAUSD school administrators, providing sufficient notice to forewarn children and parents when existing vehicle routes to school may be impacted.
- Parents dropping off their children must have access to the passenger loading areas.

Pedestrian Safety

Construction activities that include street closures, the presence of heavy equipment and increased truck trips to haul materials on and off the project site can lead to safety hazards for people walking in the vicinity of the construction site. To ensure that effective conditions are employed to reduce construction and operation related pedestrian safety impacts on District sites, we ask that the following language be included in the recommended conditions for pedestrian safety impacts:

- Contractors must maintain ongoing communication with LAUSD school administrators, providing sufficient notice to forewarn children and parents when existing pedestrian routes to school may be impacted.
- Contractors must maintain safe and convenient pedestrian routes to all nearby schools. The District will provide School Pedestrian Route Maps upon your request.
- Contractors must install and maintain appropriate traffic controls (signs and signals) to ensure pedestrian and vehicular safety.
- Haul routes are not to pass by any school, except when school is not in session.
- No staging or parking of construction-related vehicles, including worker-transport vehicles, will occur on or adjacent to a school property.
- Funding for crossing guards at the contractor's expense is required when safety of children may be compromised by construction-related activities at impacted school crossings.
- Barriers and/or fencing must be installed to secure construction equipment and to minimize trespassing, vandalism, short-cut attractions, and attractive nuisances.
- Contractors are required to provide security patrols (at their expense) to minimize trespassing, vandalism, and short-cut attractions.

The District's charge is to protect the health and safety of students and staff, and the integrity of the learning environment. The comments presented above identify potential environmental impacts related to the proposed project that must be addressed to ensure the welfare of the students attending Le Conte MS their teachers and the staff, as well as to assuage the concerns of the parents of these students. Therefore, the recommended conditions set forth in these comments should be adopted as conditions of project approval to offset environmental impacts on the affected school students and staff.

Thank you for your attention to this matter. If you need additional information, please contact me at (213) 241-4210.

Regards,

A handwritten signature in blue ink, appearing to read 'Alex Campbell', with a stylized flourish at the end.

Alex Campbell
Assistant CEQA Project Manager

Chadwick Family Comments on Sunset Gower Studios Enhancement Project Draft EIR
Submitted July 6, 2020
Representative: Nik Hlady, Elizabeth Peterson Group
nik@epgla.com
phone: (801) 706-5908

The below comments are being transmitted from the representatives of the Chadwick family, the longtime owners, original developers and stewards of the property at 1440-1448 N Gower Street at the southeast corner of the intersection of Sunset Boulevard and Gower Street ("Chadwick Property"). The property is ground-leased over a forty-year remaining term to an affiliate of the project applicant, Hudson Pacific Properties. The Chadwicks are not opposed to the proposed Sunset Gower Studios Enhancement Project and maintain a positive relationship with the property's lessee. With that being said, parts of the project and how it is analyzed in the Draft Environmental Impact Report (DEIR) are of concern. Please see the below comments to be entered into the record and to be responded to in accordance with the CEQA process.

- The Existing and Proposed Views exhibit (Figure IV.A-9-18) does not sufficiently illustrate the impacts of the project. Specifically, the exhibit fails to illustrate the potential impacts of 18-story Building A to the corner of Sunset Boulevard and Gower Street, the project's namesake. Without a better visual depiction of how this project will change the appearance of this corner (current condition shown in the photograph included below), it is difficult to draw any conclusions as to how this project would impact this corner, and the continued use of the Chadwick Property (which includes Building 35 having address 1440 N Gower Street) from both a CEQA Aesthetics perspective and from the perspective of the Citywide Design Guidelines, particularly Guideline 4, which speaks to recognizing and respecting the surrounding context.
 - Was a light and shadow study analyzing the impacts of Building A prepared? If not, will the City require that one is prepared as the project moves through the entitlement process? We request to review a light and shadow study. If none has been prepared, we ask that one be completed in order to better understand these impacts on adjacent properties, including the Chadwick Property.
 - The Cultural Resources Report (Appendix C) notes that the proposed project has the potential to affect the integrity of the "Setting" of Building 35 from a historic preservation perspective due to the construction of Building A only feet away. Elsewhere in the DEIR, there is scant analysis of the potential impacts of replacing the existing two-story buildings with the 18-story Building A on five-story Building 35, raising concerns that issues surrounding the compatibility of the proposed project have not been sufficiently analyzed. The DEIR and the Cultural Resources Report suggest that the measurement of the impact of Building A on the adjacent Chadwick Property can be ignored (aside from issues of lateral and

subjacent support) because “setting” is only one of the categories of impact that need to be evaluated. (DEIR, P. IV.C-32) This approach substitutes a purely numerical analysis for the qualitative analysis demanded of an environmental report, and in so doing, fails to address the magnitude of the impact of Building A on the Chadwick property.

- Mitigation Measure CUL-MM-2 calls for the development of an Historic Resources Plan to "document existing historic resources, identify character-defining features and resources to be preserved, and establish a treatment plan for their continued preservation." The Chadwicks have strong concerns regarding this Mitigation Measure. The Chadwick Property is unique in that the DEIR identifies Building 35 as a potential historic resource, both individually, and as a contributor to a potential historic district, yet it is located outside of the project's Entitlement Area. Building 35's inclusion in any Historic Resources Plan is a cause for concern. As historic resources identified in the DEIR that are located on the project site are demolished to make way for the project, Building 35's relative value, or weight, as a contributing resource to the potential historic district increases. The Chadwicks are concerned that the inclusion of Building 35 in a Historic Resources plan begins to create a binding commitment to preserve Building 35 as part of the development of the project that does not even include the Chadwick Property. Given that the Chadwick Property is not part of the project's entitlement area, the DEIR's mitigation measures MUST NOT create any binding commitments for Building 35 or the broader Chadwick Property or prejudice the ongoing and future use of the Chadwick Property in any way. Note that the aforementioned lease could terminate earlier than the end of the 40-year term.
- The Cultural Resources Report (Appendix C) notes that Building 35 has potential historic significance due to its Mid-Century Modern design by architect Claud Beelman. The Chadwicks, as the owners, original developers, and longtime stewards of Building 35, have a deep understanding of the history of the building. Based on our knowledge, we question the accuracy of the Cultural Resources Report's assertion that Claud Beelman designed the building. He appears to have been working as a consultant on the project, rather than as the principal architect. Based on our review of historic building permit records, Claud Beelman does appear to have been involved with an *addition and alteration* of the property at 1438 N. Gower Street (NOT 1440 N. Gower) in 1950.

The Cultural Resources Report also includes Building 35 as a contributing structure in the potential historic district, despite its being outside the boundaries of the Studio and never owned by the current or prior owners of the Studio, and based on its relatively short period of time (1951-1958) at the very end of the stated period of significance as an administrative office of Columbia Pictures. Yet the Report elsewhere acknowledges that “the internal circulation pattern [of the studio property] is also a character-defining feature of the potential historic district, highlighting the self-contained industrial nature of studio properties and emphasizing paths of travel established through historic function and use.” (DEIR p. IV.C-18.) That internal circulation feature is not present for Building 35,

which lies outside the studio boundaries. Additionally, the Cultural Resources report fails to note that Building 35 was originally constructed as a three-story building with two additional stories subsequently added on after its original construction and with its entrance altered after its original construction. We believe that for the foregoing reasons, among others, that the inclusion of the Chadwick's property in the analysis of the potential historic district, and its characterization as contributing, and by extension, the analysis of the impact of the Project on the potential historic district, is improper and not supported by the evidence.

These errors and omissions lead us to question the overall accuracy of the Cultural Resources Report, the conclusions it draws and the recommendations it makes.

- Mitigation Measure CUL-MM-6 calls for the creation of a shoring plan to ensure the protection of adjacent historic resources identified in the DEIR from damage due to deep underground excavation and general construction procedures and to reduce the possibility of settlement due to the removal of adjacent soil. The Chadwicks request to review the Shoring Plan so as to develop an understanding of the impacts of nearby construction activities to the Chadwick property both during and after construction, prior to the issuance of building permits for the project. When will the Shoring Plan be prepared and be made available for review as part of this project's entitlement process?

Thank you in advance for your close attention to the above comments and concerns. We look forward to the City's response.



Photo of the Chadwick Property, looking south and east, taken Friday, July 3, 2020