

II. Responses to Comments

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A. Introduction

Sections 21091(d) and 21092.5 of the Public Resources Code (PRC) and CEQA Guidelines Section 15088 govern the lead agency's responses to comments on a Draft EIR. CEQA Guidelines Section 15088(a) states that "[T]he lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The lead agency shall respond to comments that were received during the notice comment period and any extensions and may respond to late comments." In accordance with these requirements, this section of the Final EIR provides the responses prepared by the City of Los Angeles Department of City Planning (City) to each of the written comments received regarding the Draft EIR.

Section II.B, Matrix of Comments Received on the Draft EIR, includes a table that summarizes the environmental issues raised by each commenter regarding the Draft EIR. Section II.C, Responses to Comments, provides the City's responses to each of the written comments raised in the comment letters received on the Draft EIR. Copies of the original comment letters are provided in Appendix FEIR-1 of this Final EIR.

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II. Responses to Comments

B. Matrix of Comments Received on the Draft EIR

Table II-1 Matrix of Comments Received on the Draft EIR																																			
Letter No.	Commenter	Executive Summary	Project Description	Environmental Setting	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Public Services—Libraries	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Utilities and Service Systems—Solid Waste	Utilities and Service Systems—Energy Infrastructure	Cumulative Impact	Alternatives	General/Other	CEQA	Mitigation Measures	Support	
STATE AND REGIONAL																																			
1	Christine Asiata christine.asiata@opr.ca.gov																															X			
2	Miya Edmonson IGR/CEQA Branch Chief Division of Planning—LD-IGR Branch Caltrans District 7 100 S. Main St., MS 16 Los Angeles, CA 90012-3712																						X												
3	Lijin Sun, Program Supervisor CEQA Inter-Governmental Review Planning, Rule Development & Area Sources SCAQMD 21865 Copley Dr. Diamond Bar, CA 91765-4178					X																												X	
4	Ali Poosti Division Manager Wastewater Engineering Services Division LA Sanitation and Environment																									X									
ORGANIZATIONS																																			
5	Adrian Scott Fine Director of Advocacy Los Angeles Conservancy 523 W. Sixth St., Ste. 826 Los Angeles, CA 90014-1248							X																										X	

Table II-1 (Continued)
Matrix of Comments Received on the Draft EIR

Letter No.	Commenter	Executive Summary	Project Description	Environmental Setting	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Public Services—Libraries	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Utilities and Service Systems—Solid Waste	Utilities and Service Systems—Energy Infrastructure	Cumulative Impact	Alternatives	General/Other	CEQA	Mitigation Measures	Support
6	Robyn Myers Management Analyst Facilities & Events Management Los Angeles Public Library 630 W. Fifth St. Los Angeles, CA 90071-2002																					X												
7	Alex Campbell Assistant CEQA Project Manager Office of Environmental Health and Safety Los Angeles Unified School District 333 S. Beaudry Ave., Fl. 21 Los Angeles, CA 90017-1466																		X				X											
INDIVIDUALS																																		
8	Chadwick Family c/o Nik Hlady Elizabeth Peterson Group 400 S. Main St., Unit 808 Los Angeles, CA 90013-1326							X																									X	

II. Responses to Comments

C. Comment Letters

Comment Letter No. 1

Christine Asiata
christine.asiata@opr.ca.gov

Comment No. 1-1

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.

Response to Comment No. 1-1

This comment, which confirms receipt and posting of the Draft EIR by SCH and informs the City that the State Clearinghouse is moving to a digital response system, is noted for the record.

Comment No. 1-2

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

Thank you for using CEQA Submit.

To view your submission, use the following link.

<https://ceqasubmit.opr.ca.gov/Document/Index/122807/2>

Response to Comment No. 1-2

This comment, which provides a link to the State Clearinghouse webpage for the Project, is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment Letter No. 2

Miya Edmonson
IGR/CEQA Branch Chief
Division of Planning—LD-IGR Branch
Caltrans District 7
100 S. Main St., MS 16
Los Angeles, CA 90012-3712

Comment No. 2-1

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).

Response to Comment No. 2-1

This introductory comment, which provides general information regarding the proposed Project and its location relative to Caltrans facilities, as well as acknowledges the City is the Lead Agency is noted for the record and will be forwarded to the decision makers for their review and consideration. The Draft Environmental Impact Report (EIR) described the Project in Chapter 2, Project Description. Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 2-2

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.

Response to Comment No. 2-2

This Comment correctly notes that in accordance with Senate Bill 743 (SB 743), the City of Los Angeles Department of Transportation (LADOT) has adopted a Vehicle Miles Traveled (VMT) metric for evaluation of transportation impacts for proposed developments and has eliminated consideration of delay and capacity based metrics, such as level of service (LOS), when determining the significance of a proposed project's impacts. This comment states that the DEIR was reviewed based on a VMT perspective. The comment is noted for the record and will be forwarded the decision makers for review and consideration.

Comment No. 2-3

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.

Response to Comment No. 2-3

The Draft EIR addressed the Project's traffic impacts in Section IV.J, Transportation, of the Draft EIR, which is based on supporting analyses provided in Appendix J of the Draft EIR. This Comment accurately summarizes the Project work VMT per employee results, prior to and with implementation of the transportation demand management (TDM)

program, based on the analysis conducted in the *Memorandum: CEQA Thresholds Analysis for the Sunset Gower Studios Preservation and Enhancement Plan* (Gibson Transportation Consulting, Inc., February 26, 2020) (CEQA Analysis Memo), which is included as Appendix J of the Draft EIR. The CEQA Analysis Memo was reviewed and approved by LADOT via an inter-departmental memorandum to the Los Angeles Department of City Planning (LADCP) on April 2, 2020 (LADOT 2020 Assessment Letter), which is also included in Appendix J of the Draft EIR. Consistent with the findings summarized in the Draft EIR, this Comment concurs with the findings that the Project would neither result in a significant VMT impact nor cumulative VMT impacts according to the 2018 State Office of Planning and Research (OPR) Technical Advisory on Evaluation Transportation Impacts in CEQA.

Comment No. 2-4

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.

Response to Comment No. 2-4

As previously noted, the Project does not result in significant transportation impacts and thus, no mitigation measures are required. Nonetheless, the Project includes transportation improvements including TDM, transportation systems management (TSM), and other intersection improvements. The TDM, TSM, and intersection improvements are outlined in the Project Requirement Section of the LADOT 2020 Assessment Letter contained in Appendix J. This Comment requests an opportunity for Caltrans review of any transportation systems management (TSM), TDM, or intersection improvements that are proposed or required by the Project that will be implemented in or near the Caltrans right-of-way.

As part of the Project's requirements stated in LADOT 2020 Assessment Letter, the Project will contribute up to \$270,000 toward TSM improvements in the Hollywood-Wilshire District to better accommodate intersection operations throughout the Study Area. Such improvements include new system loops, video detection systems, and video fibers. LADOT identified a preliminary list of potential TSM improvements that could be considered

as detailed in Attachment E of LADOT 2020 Assessment Letter. Secondly, the Project will also prepare and implement a TDM program to reduce peak-hour vehicle traffic to and from the Project Site, as detailed in the Response to Comment No. 2-5, below. The TDM program is included as Project Design Feature TR-PDF-2. Lastly, the Project will contribute towards intersection improvements at Van Ness Avenue & Sunset Boulevard as described in Attachment F of LADOT 2020 Assessment Letter. The TDM, TSM, and intersection improvements are not anticipated to require work within Caltrans right-of-way. However, Caltrans will be notified and permits obtained (if needed) for those identified improvements within Caltrans jurisdiction.

Comment No. 2-5

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.

Response to Comment No. 2-5

This Comment encourages the use of TDM measures to reduce VMT and greenhouse gas (GHG) emissions. As discussed in Section IV.J, Transportation, of the Draft EIR, consistent with the City's policies on sustainability and smart growth and with LADOT's trip reduction and multi-modal transportation goals, the Project will prepare and implement a TDM program to promote other modes of travel and reduce peak-hour vehicle

traffic to and from the Project Site. The TDM program, included as Project Design Feature TR-PDF-2, would promote non-automobile travel and reduce the use of single-occupant vehicle trips with a comprehensive program of design features, transportation services, education programs, and incentive programs. These strategies can include, but are not necessarily limited to, the following:

- On-site TDM coordinator;
- Transportation Information Center/Kiosk, educational programs, and/or other measures;
- Promotion and support of carpools and rideshare;
- Guaranteed ride home program, short-term car rentals;
- “Parking cash-out” subsidy and/or unbundled parking;
- Parking incentives and support for formation of carpools/vanpools;
- Mobility hub support to provide bicycle parking rentals, shared vehicle rentals, and transit information at the Project Site, etc.;
- One-time financial contribution of \$75,000 to LADOT to be used for implementation of the Mobility Hub in the general area of the Project;
- Bicycle and pedestrian-friendly amenities with exclusive access points, secured bicycle facilities, and showers;
- One-time fixed fee contribution of \$75,000 to the City’s Bicycle Trust Fund for implementation of bicycle improvements in the Project area; and
- Participation as a member in the future Hollywood Community Transportation Management Organization (TMO), when operational.

The comment regarding other considerations for the TDM plan are noted for the record and will be forwarded to the decision makers for consideration.

Comment No. 2-6

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.

Response to Comment No. 2-6

This comment outlines permitting and review requirements for use of Caltrans facilities. This comment is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment No. 2-7

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.

Response to Comment No. 2-7

This comment, which concludes the letter and provides a point of contact, is noted for the record.

Comment Letter No. 3

Lijin Sun, Program Supervisor
CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources
SCAQMD
21865 Copley Dr.
Diamond Bar, CA 91765-4178

Comment No. 3-1

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 (NO_x) 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 NO_x 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 NO_x 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.

Response to Comment No. 3-1

This comment is introductory and provides an accurate summary of the Project and findings. It is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 3-2

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 NO_x 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 NO_x 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.

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.

Response to Comment No. 3-2

This comment provides a summary of SCAQMD's more detailed comments below. Please refer to Response to Comment No. 3-4 regarding the use of a haul truck trip length of 25 miles (one way) to quantify haul truck trips. Please refer to Response to Comment No. 3-5 regarding AIR-MM-1 and Response to Comment No. 3-6 regarding regional SCAQMD's proposed mitigation measures for on-road construction trucks.

Comment No. 3-3

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.

Response to Comment No. 3-3

This Final EIR, including the responses to comments, has been completed in accordance with CEQA requirements. In addition, in accordance with CEQA requirements, responses to SCAQMD's comments will be sent to the SCAQMD as part of the Final EIR distribution at least 10 days prior to any future certification of the EIR. The City, in making the findings for the Project, will comply with the requirements of Section 15091 of the CEQA Guidelines.

Comment No. 3-4**Attachment****1. Construction Air Quality Impact Analysis**

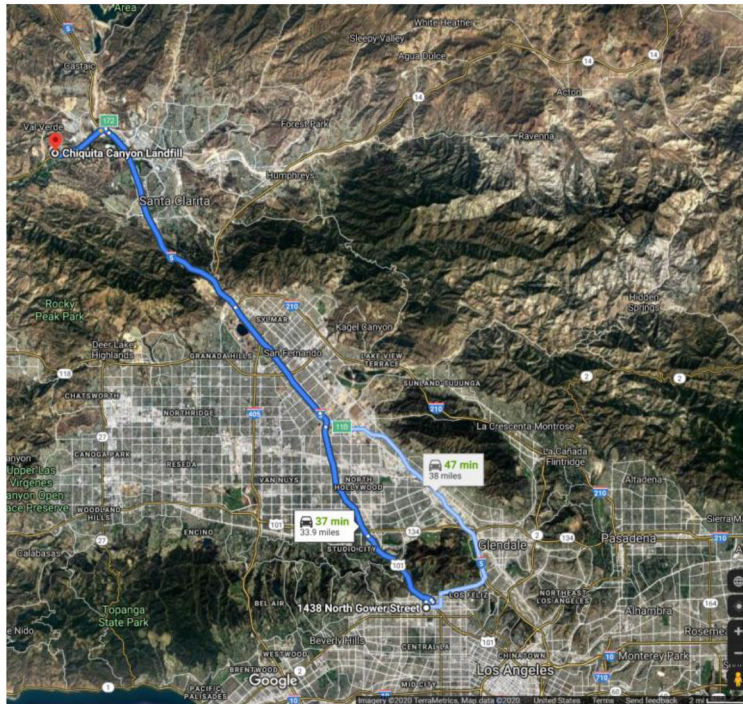
Based on a review of the Draft EIR and the Air Quality and Greenhouse Gas Analysis Technical Appendix, South Coast AQMD staff found that the Lead Agency used a haul truck trip length of 25 miles (one way)⁹ to quantify the Proposed Project's hauling emissions from soil export. In the Transportation Appendix 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).

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

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

¹¹ *Ibid.* Page 138.

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.

Response to Comment No. 3-4

This comment correctly identifies that the Transportation Appendix to the Draft EIR identifies that haul trucks will travel from the Proposed Project to the Chiquita Landfill. However, haul truck activity would use Sunshine Landfill. Refer to the revised Transportation Appendix in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, of this Final EIR. As shown therein, the one-way distance is 25 miles and consistent with the distance used in the Draft EIR Air Quality analysis. No revisions to the Air Quality analysis or conclusions of the Draft EIR are necessary based on this comment.

Comment No. 3-5

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.

¹² *Ibid.*

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

Response to Comment No. 3-5

In consideration of the SCAQMD recommendation, additional data was reviewed regarding the availability of Tier 4 Final equipment within the Los Angeles area. The additional data is provided in Section II, Revisions, Clarifications and Correction to the Draft EIR, of this Final EIR. As shown therein, Tier 4 Final equipment is available in sufficient capacity to strike the "where feasible" language from the mitigation measure. Mitigation Measure AIR-MM-1 has been refined in this Final EIR as shown in Section II, Revisions, Clarifications and Correction to the Draft EIR, of this Final EIR, and as follows:

Mitigation Measure AIR-MM-1: Prior to Demolition, the Project representative shall make available to the lead agency or City of Los Angeles Department of Building and Safety and the South Coast Air Quality Management District a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that with the exception of demolition activities will be used during any portion of construction. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit's certified tier specification, Best Available Control Technology documentation, and California Air Resources Board or Air Quality Management District operating permit shall be available onsite at the time of mobilization of each applicable unit of equipment to allow the Construction Monitor to compare the on-site equipment with the inventory and certified Tier specification and operating permit. Off-road diesel-powered equipment within the construction inventory list described above shall meet the EPA Tier 4 Final standards.

Comment No. 3-6**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 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 NO_x 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 NO_x 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 NO_x 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 NO_x 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 NO_x 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. 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.

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>.

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.

Response to Comment No. 3-6

This comment correctly identifies that haul truck activity comprises a substantial portion of the regional construction NO_x impact. Based on a review of SCAQMD's recommended mitigation, the following mitigation measure is included in Section II, Revisions, Clarifications and Correction to the Draft EIR, of this Final EIR:

Mitigation Measure AIR-MM-2: The Project representative shall require operator(s)/ construction contractor(s) to 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 NO_x emissions or newer, cleaner trucks for: (1) haul trucks associated with grading of Building A, Parking Structure, and Subterranean Parking Structure; and (2) concrete delivery trucks during concrete mat foundation pours for Building A, Parking Structure, and Subterranean Parking Structure. To monitor and ensure 2010 model

year or newer trucks are used at the Proposed Project, the Lead Agency shall require that truck operator(s)/construction contractor(s) maintain records of trucks during the applicable construction activities associated with the Proposed Project and make these records available to the Lead Agency upon request. The records shall be submitted to the City of Los Angeles Department of City Planning at Project plan check and will be available onsite at the time of mobilization of each applicable construction phase providing documentation that each concrete delivery truck/haul truck meets CARB's 2010 engine emission standards.

In the event that Alternative 2, the environmentally superior alternative, is approved, the phasing is slightly different and the mitigation should be modified as follows:

Mitigation Measure AIR-MM-2 (Alternative 2): The Project representative shall require operator(s)/construction contractor(s) to 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 NO_x emissions or newer, cleaner trucks for: (1) haul trucks associated with grading activities; and (2) concrete delivery trucks during concrete mat foundation pours. To monitor and ensure 2010 model year or newer trucks are used at the Proposed Project, the Lead Agency shall require that truck operator(s)/construction contractor(s) maintain records of trucks during the applicable construction activities associated with the Proposed Project and make these records available to the Lead Agency upon request. The records shall be submitted to the City of Los Angeles Department of City Planning at Project plan check and will be available onsite at the time of mobilization of each applicable construction phase providing documentation that each concrete delivery truck/haul truck meets CARB's 2010 engine emission standards.

The reduction in emissions associated with Mitigation Measure AIR-MM-2 is provided in Section II, Revisions, Clarifications and Correction to the Draft EIR (Appendix B-2(a)), of this Final EIR. As shown therein, use of 2010 or newer trucks during grading and mat foundation pours would reduce maximum Project related regional construction NO_x impacts from 204 pounds per day to 87 pounds per day and below the SCAQMD's significance threshold of 100 pounds per day. In addition, Alternative 2 related regional construction NO_x impacts would be reduced from a maximum of 204 pounds per day to 92 pounds per day and below the SCAQMD's significance threshold of 100 pounds per day.

Use of 2010 or newer trucks is sufficient to avoid a significant regional construction air quality impact and, therefore, further evaluation of ZE/NZE standards was not considered.

Comment Letter No. 4

Ali Poosti
Division Manager
Wastewater Engineering Services Division
LA Sanitation and Environment

Comment No. 4-1

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 [sic] and 6060 Sunset Boulevard, 1455 N. Beachwood Drive, 1455 Gordon Street. [sic] 1438 and 1440 N Gower Street , [sic] 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.

Response to Comment No. 4-1

This comment introduces the comments that follow, briefly summarizes the Project, and states the responsibilities of the City of Los Angeles Bureau of Sanitation (LASAN) Wastewater Engineering Services Division. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment No. 4-2**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

Response to Comment No. 4-2

The wastewater generation estimates detailed above are generally similar to those provided in LASAN's NOP comment letter dated March 21, 2018, which is included in Appendix A of the Draft EIR. However, more precise wastewater generation estimates are provided in Section IV.L.2, Utilities and Service Systems—Wastewater, of the Draft EIR, which account for the proposed creative office and production support uses, cafeteria, cooling tower, as well as required water conservation features. With these more specific factors, the Project would result in an estimated total net wastewater generation of 80,240 gallons per day (gpd). In addition, based on the Sewer Capacity Availability Requests (SCAR) approved in October 2018 (Appendix L of the Draft EIR), the Project would be permitted to discharge a maximum of 90,643 gpd. The SCAR accounted for other nearby projects that have the potential to use the same wastewater system as the Project. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and a connection permit for the Project during the Project's permitting process. Accordingly, as concluded in Section IV.L.2, Utilities and Service Systems—Wastewater, of the Draft EIR, with the connection of the laterals and approval of a connection permit, the sewer system capacity would be adequate to accommodate the additional wastewater infrastructure demand created by the Project. As a result, impacts with respect to wastewater infrastructure and treatment capacity were determined to be less than significant.

Comment No. 4-3**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

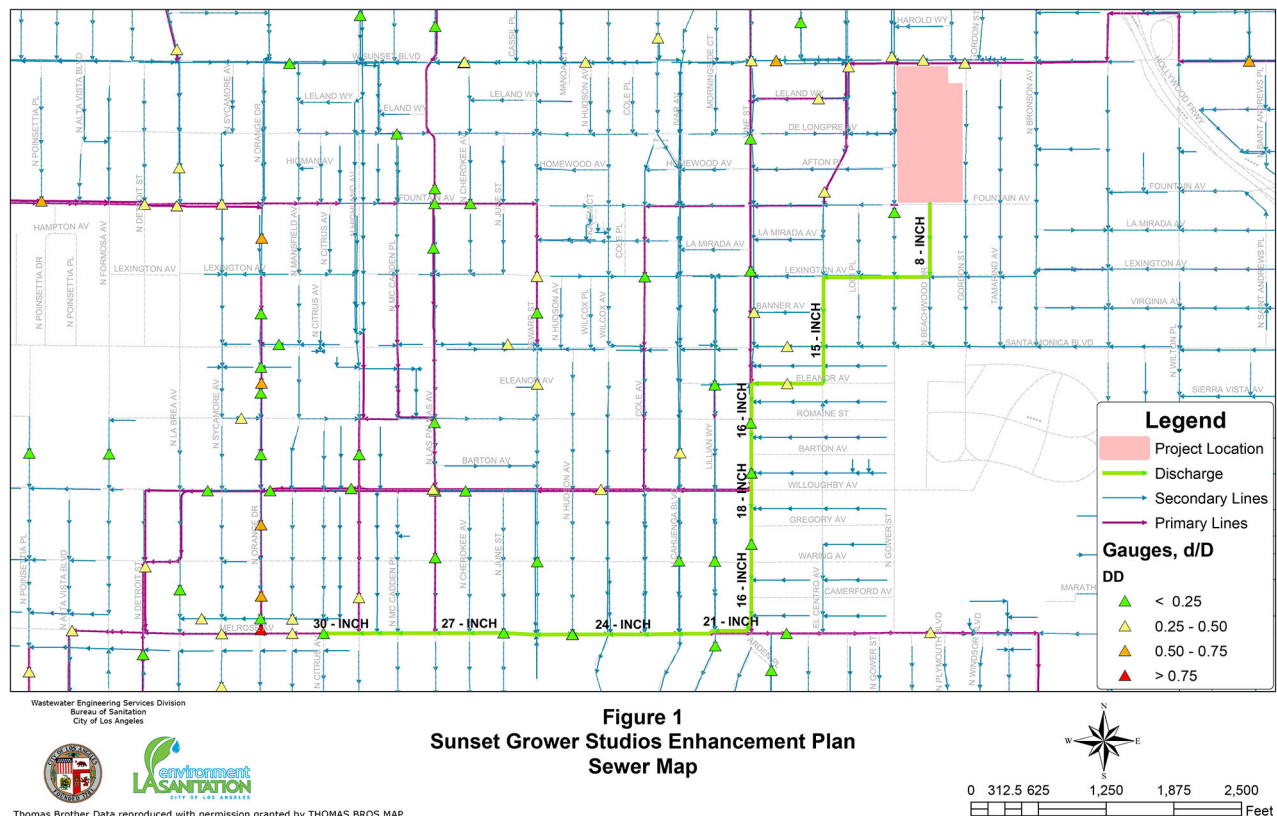
18-inch line on Vine St, then into a 24-inch line on Melrose Ave before discharging into a 30-inch sewer line on Melrose Ave. Figure 1 shows the details of the sewer system within the vicinity of the project. The current flow level (d/D) in the 6-inch line cannot be determined at this time without additional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

Attachment: Figure 1—Sewer Map



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.

Response to Comment No. 4-3

The above description of the existing sewer infrastructure in the vicinity of the Project Site and the associated flow level and design capacity of the lines is generally consistent with that previously provided in LASAN's NOP comment letter dated March 21, 2018, which is included in Appendix A of the Draft EIR. Based on the SCAR approved in October 2018 (Appendix L of the Draft EIR), the Project would be permitted to discharge a maximum of 90,643 gpd. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and a connection permit for the Project during the Project's permitting process. Accordingly, as concluded in Section IV.L.2, Utilities and Service Systems—Wastewater, of the Draft EIR, with the connection of the laterals and approval of a connection permit, the sewer system capacity would be adequate to accommodate the additional wastewater infrastructure demand created by the Project. All necessary on-site improvements would be finalized during the design phase and reviewed by LASAN, as required. In addition, consistent with this comment, the Draft EIR determined that the Hyperion Water Reclamation Plant has sufficient capacity to accommodate the Project. As a result, impacts with respect to wastewater infrastructure and treatment capacity were determined to be less than significant.

Comment No. 4-4**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.

Response to Comment No. 4-4

The information provided in the comment above summarizes post-construction stormwater mitigation requirements and is consistent with that previously provided by LASAN, including in their March 21, 2018, NOP comment letter, which is included in Appendix A of the Draft EIR. As detailed in Section VI, Other CEQA Considerations, of the Draft EIR, and evaluated in the Initial Study prepared for the Project, included in Appendix A of the Draft EIR, the Project would comply with the City's Low Impact Development (LID) Ordinance (Ordinance No. 181,899), and Best Management Practices (BMPs) would be implemented on-site to filter, treat, and reduce stormwater pollutants on-site before discharging into the municipal storm drain system consistent with regulatory requirements. As detailed in the Project's Water Resources Technical Report (Appendix IS-4 of the Initial Study), given that infiltration is considered infeasible, a stormwater capture and use system will likely be used on-site. If capture and use is later determined not to be feasible, the Project would then be required to implement High Efficiency Biofiltration/Bioretenion

Systems. As concluded in the Project's Water Resources Technical Report, implementation of required BMPs would mitigate at minimum the first flush or the equivalent of the greater between the 85th percentile storm and first 0.75 inch of rainfall for any storm event. As such, the Project's Water Resources Technical Report, impacts to water quality were determined to be less than significant.

The Project Applicant and civil engineer will continue to comply with applicable City requirements, including submittal of a LID Plan to the Bureau of Sanitation Watershed Protection Division (WPD) for review and approval as required prior to building permit issuance.

Comment No. 4-5

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/

Response to Comment No. 4-5

The information in the comment above is consistent with that previously provided by LASAN, including in their March 21, 2018, NOP comment letter, which is included in Appendix A of the Draft EIR. As described in Response to Comment No. 4-4, a capture and use system will likely be used on-site. If capture and use is later determined not to be feasible, the Project would then be required to implement High Efficiency Biofiltration/Bioretenion Systems. In addition, as described in Section II, Project Description, of the Draft EIR, the Project would provide 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. The Project would also incorporate a weather-based irrigation system as well as water-efficient landscaping with use of drought tolerant plants in up to 60 percent of the proposed landscaping. As such, the Project would support the City's Green Streets Initiative.

Comment No. 4-6**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 [sic] plan-checking counter at (213) 482-7066. WPD's plan-checking counter can also be visited at 201 N. Figueroa, 2nd Fl, Suite 280.

Response to Comment No. 4-6

The information in the comment above is consistent with that previously provided by LASAN, including in their March 21, 2018, NOP comment letter, which is included in Appendix A of the Draft EIR. As detailed in Section VI, Other CEQA Considerations, of the Draft EIR, and evaluated in the Initial Study prepared for the Project, included in Appendix A of the Draft EIR, the Project would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit (Order No. 2012-0006-DWQ) pursuant to NPDES requirements. In accordance with the permit requirements, a SWPPP would be developed and implemented during Project construction. The SWPPP would set forth BMPs for stormwater and non-stormwater discharges, including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff during construction. The SWPPP would be carried out in compliance with State Water Resources Control Board (SWRCB) requirements and would also be subject to review by the City for compliance with the City of Los Angeles' *Best Management Practices Handbook, Part A Construction Activities*. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. Prior to the issuance of a grading permit, the Applicant would be required to provide LADBS with evidence that a Notice of Intent has been filed with the SWRCB to comply with the General Construction Permit. With compliance with these existing regulatory requirements, impacts to water quality during construction would be less than significant.

The Project Applicant and civil engineer will continue to comply with applicable City requirements, including preparation and implementation of a Wet Weather Erosion Control Plan, as required.

Comment No. 4-7

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 [sic] or greg.reed@ladwp.com.

Response to Comment No. 4-7

The information in the comment above is consistent with that previously provided by LASAN, including in their March 21, 2018, NOP comment letter, which is included in Appendix A of the Draft EIR. As detailed in the Initial Study prepared for the Project, included in Appendix A of the Draft EIR, the Project’s maximum proposed excavation of up to 42 feet below ground surface is not anticipated to disturb the groundwater table during construction. Even if seasonal or perched groundwater is encountered during excavation, a temporary dewatering system, such as pumping or wellpoints, would be implemented in accordance with NPDES permit requirements.

Comment No. 4-8

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.

Response to Comment No. 4-8

As discussed in Section VI, Other CEQA Considerations, of the Draft EIR, and evaluated in the Initial Study prepared for the Project, included in Appendix A of the Draft EIR, the Project would be subject to the City’s Space Allocation Ordinance (Ordinance No. 171,687), which requires the provision of an adequate recycling area or room for collecting and loading recyclable materials, as cited in the comment above. In addition, the Project would also comply with AB 939, AB 341, AB 1826, and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Accordingly, the Project would comply with this requirement.

Comment Letter No. 5

Adrian Scott Fine
Director of Advocacy
Los Angeles Conservancy
523 W. Sixth St., Ste. 826
Los Angeles, CA 90014-1248

Comment No. 5-1

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.

Response to Comment No. 5-1

This introductory comment, which relates to the Project's significant and unavoidable impacts on cultural resources and acknowledgement that Alternative 2 will not result in significant impacts to cultural resources, is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment No. 5-2**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.

Response to Comment No. 5-2

This comment is consistent with the analysis provided in Section IV.C, Cultural Resources, of the Draft EIR, which concludes that due to the demolition of 6050 Sunset Boulevard, the Project would cause a substantial adverse change in the significance of an historical resource. Implementation of all feasible mitigation measures, including Mitigation Measures CUL-MM-1 through CUL-MM-6 would reduce these impacts. Nevertheless, impacts to historical resources would remain significant and unavoidable under the Project.

Comment No. 5-3

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.

Response to Comment No. 5-3

As detailed in Section V, Alternatives, of the Draft EIR and acknowledged by this comment, Alternative 2 would eliminate the Project's significant and unavoidable impact with regard to historical resources. Consistent with the Conservancy's understanding, Alternative 2 preserves additional contributing resources within the potential historic district as well as the historic building located at 6050 Sunset, by relocating 6050 Sunset into the interior of the studio lot. The intact recording studio interior will also be maintained and preserved as part of this building's relocation under Alternative 2. The Conservancy's preference for Alternative 2 is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment No. 5-4

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.

Response to Comment No. 5-4

The nomination of the Sunset Gower Studio Historic District is not required by CEQA. In addition, should the Applicant decide to undergo the nomination process, the designation process is beyond the Applicant's control and it cannot be guaranteed that the historic district will be subsequently approved for designation as a National Register Historic District and/or a California Register Historic District.

Comment No. 5-5**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.

Response to Comment No. 5-5

The nomination of the 6050 Sunset Boulevard, 1455 Gordon Street (Alley Cat Studio), and 1440 Gower Street (Building 35) buildings is not required by CEQA and the 1440 Gower Street building is not part of the property for which the Applicant is requesting entitlements. In addition, should the Applicant decide to undergo the nomination process for the 6050 Sunset Boulevard and 1455 Gordon Street buildings, the designation process is beyond the Applicant's control and it cannot be guaranteed that the buildings will be subsequently approved for designation as individual historical resources.

Comment No. 5-6**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.

Response to Comment No. 5-6

This comment provides support for the development of Alternative 2 and will be forwarded to the decision-makers for their review and consideration.

Comment No. 5-7

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.

Response to Comment No. 5-7

This comment, which concludes the letter and provides a point of contact, will be forwarded to the decision makers for their review and consideration.

Comment Letter No. 6

Robyn Myers
Management Analyst
Facilities & Events Management
Los Angeles Public Library
630 W. Fifth St.
Los Angeles, CA 90071-2002

Comment No. 6-1

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

Response to Comment No. 6-1

This comment acknowledges receipt of the Draft EIR by the Los Angeles Public Library (LAPL) and is noted for the administrative record.

Comment No. 6-2

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 , [sic] 90028

Los Feliz Branch Library
1874 Hillhurst Av
Los Angeles ,90027 [sic]

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.

Response to Comment No. 6-2

This comment provides information regarding the LAPL branches that serve the Project vicinity. Analysis of potential impacts to libraries is included in the Initial Study included as Appendix A of the Draft EIR. As discussed therein, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of residents within the service population of the LAPL. Furthermore, as Project employees would be more likely to use library facilities near their homes during non-work hours, and given that some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, Project employees and the potential indirect population generation that could be attributable to those employees would generate minimal demand for library services. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities or the need for new or physically altered library facilities. Impacts would be less than significant, and no mitigation measures are required. Overall, the information above does not change the determination of the Initial Study that the Project would have a less-than-significant impact on library facilities and is noted for the administrative record.

Comment No. 6-3

Attachment:

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 [sic]

Size of facility in Square feet

10,449

Collection size

49,535

Annual Circulation

131,101

Staffing level

10FTE [sic]

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 , [sic] 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

Response to Comment No. 6-3

This above information included in the attachment to the LAPL comment letter does not change the determination of the Initial Study that the Project would have a less-than-significant impact on library facilities and is noted for the administrative record.

Comment Letter No. 7

Alex Campbell
Assistant CEQA Project Manager
Office of Environmental Health and Safety
Los Angeles Unified School District
333 S. Beaudry Ave., Fl. 21
Los Angeles, CA 90017-1466

Comment No. 7-1

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.

Response to Comment No. 7-1

As discussed in Section VI, Other CEQA Considerations, of the Draft EIR, and evaluated in the Initial Study prepared for the Project, included in Appendix A of the Draft EIR, impacts on LAUSD schools would be less than significant. Specific issues raised by the commenter are addressed in Response to Comment Nos. 7-3 and 7-4, below. As discussed therein, no new significant impacts were identified.

Comment No. 7-2**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.

Response to Comment No. 7-2

Prior to commencement of construction activities, the Applicant will notify LAUSD's Transportation Branch of the expected start and end dates of construction.

Comment No. 7-3

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.
- 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.

Response to Comment No. 7-3

As detailed in Section IV.J, Transportation, of the Draft EIR, pursuant to Project Design Feature TR-PDF-1, a Construction Management Plan would be prepared and submitted to the City for review and approval. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to ensure that significant impacts would not occur. The Construction Management Plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include, but not be limited to, the following elements, as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent streets.
- Temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities adjacent to Sunset Boulevard and Gordon Street, to ensure traffic safety on public rights-of-way. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety at the Project Site's driveways.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men).
- Schedule of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Containment of construction activity within the Project Site boundaries.
- Prohibition on construction-related vehicles/equipment parking on surrounding public streets.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate.
- Scheduling of construction-related deliveries, haul trips, etc., to occur outside commuter peak hours (after 7:00 a.m. or before 3:00 p.m.) to the extent feasible.
- Installation of appropriate traffic signs around the Project Site to ensure pedestrian, bicycle, and vehicle safety.
- No staging of hauling trucks on any streets adjacent to the Project, unless specifically approved as a condition of an approved haul route.
- Spacing of trucks so as to discourage a convoy effect.
- Sufficient dampening of the construction area to control dust caused by grading and hauling and reasonable control at all times of dust caused by wind.
- Securing of loads by trimming and watering or covering to prevent the spilling or blowing of the earth material.
- Cleaning of trucks and loads at the export site to prevent blowing dirt and spilling of loose earth.
- Maintenance of a log documenting the dates of hauling and the number of trips (i.e., trucks) per day available on the job site at all times.

- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities. The telephone number shall be posted at the site readily visible to any interested party during site preparation, grading, and construction.

As shown in Section III, Revisions, Clarifications and Corrections to the Draft EIR, most of the suggested LAUSD conditions within this comment have been added to the Construction Management Plan. As discussed in the EIR, the closest school to the Project Site is Joseph Le Conte Middle School located approximately 0.25 mile to the southeast. As such, on-site construction activities would not impact the school. In addition, as shown in Section III, Revisions, Clarifications and Corrections to the Draft EIR, the Project's proposed haul route does not pass by any LAUSD school facilities (including Joseph Le Conte Middle School) and thus would not impede access to any school loading zone. Specifically, haul trucks arriving and departing the Project Site are likely to access US 101 via Sunset Boulevard and Hollywood Boulevard. Arriving haul trucks would exit US 101 Southbound Off-ramp at Van Ness Avenue, then travel westbound along Sunset Boulevard and travel southbound on Gordon Street to the Project Site. Departing haul trucks would exit the site with a right turn onto Gordon Street and then a right turn onto Fountain Avenue or exit the site with a right turn on Fountain Avenue. Trucks would then turn right onto Gower Street traveling north, then turn right onto Hollywood Boulevard travel eastbound to access US 110 Northbound on-ramp and continue to the Sunshine Landfill via SR 170, and I-5. Therefore, the suggested conditions regarding student passenger drop off and altered bus stops are not applicable to the Project and have not been incorporated. In addition, with respect to the suggested conditions regarding construction-related traffic delays and construction affecting LAUSD's school buses' on-time performance, as discussed in Section IV.J, Transportation, of the Draft EIR, in accordance with State requirements, the City now uses vehicle miles traveled (VMT) and not delay (level of service) for evaluating traffic impacts. Therefore, these suggested conditions related to delay and roadway performance have not been included. With implementation of the applicable measures added in response to this comment, potential impacts on nearby schools would continue to be less than significant.

Comment No. 7-4

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

Response to Comment No. 7-4

This comment, which concludes the letter and provides a contact number, is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment Letter No. 8

Chadwick Family
c/o Nik Hlady
Elizabeth Peterson Group
400 S. Main St., Unit 808
Los Angeles, CA 90013-1326

Comment No. 8-1

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.

Response to Comment No. 8-1

This introductory comment is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment No. 8-2

- 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.

Response to Comment No. 8-2

Pursuant to Senate Bill 743 and ZI No. 2452, the Project's aesthetics impact would not be considered significant. Nonetheless, an analysis of the Project's potential aesthetic impacts was prepared for informational purposes. As detailed in Section VI, Other CEQA Considerations, of the Draft EIR, and evaluated in the Initial Study prepared for the Project, included in Appendix A of the Draft EIR, the Project does not propose any new development along Gower Street. In addition, there would be no publicly available scenic vistas from Sunset Boulevard because the area is highly urbanized and developed with one- to four-story buildings (i.e., Siren Studios buildings at 6087, 6069, 6061, 6063 Sunset Boulevard) on the north side of Sunset Boulevard. Therefore, views are already obstructed along Sunset Boulevard. In addition, the Project Site is not located along a State or City-designated scenic highway, and thus, the Project would not substantially damage scenic resources within is scenic highway. The Project would also not generate substantial glare that would adversely affect views in the area.

A detailed analysis of the Project's consistency with regulations adopted for the purpose of mitigating aesthetic impacts, including the Citywide Design Guidelines is also included in Section IV.A, Aesthetics, of the Draft EIR. As described therein, the design of the Project would respect the existing development context, including the buildings located at 1440–1448 N. Gower Street. In particular, Building A, which would be located to the east of the 1440–1448 North Gower Street property, would feature varying façade planes articulated by sawtooth windows, glass curtain walls, and exposed black steel beams. The overall mass of Building A would be distilled into discrete volumes, thereby reducing its scale and enhancing its visual interest on the street and in the larger urban context. In addition, the design would include varied glass profiles, as well as a high level of architectural detailing that pays homage to the historic structures on the studio lot. Overall, the detailed analysis included in Section IV.A, Aesthetics, of the Draft EIR concludes that the Project would be consistent with the relevant regulations related to mitigating aesthetic impacts, including the Citywide Design Guidelines.

As such, aesthetic impacts were determined to be less than significant.

Comment No. 8-3

- 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.

Response to Comment No. 8-3

As discussed above, pursuant to Senate Bill 743 and ZI No. 2452, the Project's aesthetic impacts would not be considered significant. Nonetheless, the Initial Study and Draft EIR included an analysis of the Project's potential aesthetic impacts for informational purposes only. A shading analysis was not included in the Draft EIR as shading is not covered by the most recent update to Appendix G Thresholds. A shade and shadow study would be required of the Applicant and be included as part of the entitlement case for the Project, available to the public and to be considered by the decision maker for the Project.

Comment No. 8-4

- 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.

Response to Comment No. 8-4

This comment relates to proprietary concerns associated with the compatibility of the proposed Project and is beyond the scope of CEQA. As discussed in Section IV.C, Cultural Resources, of the Draft EIR, historic integrity is defined by National Register Bulletin 16 as the authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existed during the property's historic period. A property's integrity is evaluated based on seven aspects, including its setting; this is not a quantitative analysis but is instead based on a qualitative review of which aspects are most important in conveying the character and identity of a particular property based on its historic significance. The National Park Service notes in National Register Bulletin 15 that each type of property depends on certain aspects of integrity, more than others, to express its historic significance. As such, an analysis of integrity is not limited solely to how many aspects of integrity are retained, but rather whether the aspects most important to conveying the historic identity of a particular property are present.

As detailed in Section, IV.C, Cultural Resources, of the Draft EIR, the National Park Service defines "setting" as the physical environment of a historic property and refers to the character of the place in which the property played its historical role.

The Project would nominally alter a portion of the setting of Building 35 as a result of adjacent new construction to the northeast and east of the building. However, these alterations would be limited to the area to the east abutting the rear of Building 35. In addition, at present the area to the east abutting the rear of Building 35 is largely occupied by buildings which are considered to be non-contributors to the historic district due to substantial alterations. As a result, the setting of Building 35 in this area has been previously altered and does not reflect its historic condition. Furthermore, in accordance with Mitigation Measure CUL-MM-5, the proposed new buildings would be designed and constructed in accordance with the Secretary of the Interior's Standards for Rehabilitation, including Standards 9 and 10. Therefore, further alterations to the building's setting in the same area do not constitute a further loss of existing historic integrity.

The spatial relationships and historic character associated with the building's primary (west) facade fronting North Gower Street, as viewed from the public right-of-way, will remain intact, and the immediate surroundings to the north, south, and west that also contribute to the building's setting will continue to be preserved.

Comment No. 8-5

- 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.

Response to Comment No. 8-5

This comment relates to proprietary concerns associated with long-term operation of Building 35 and is beyond the scope of CEQA. As detailed in Section IV.C, Cultural Resources, of the Draft EIR, Mitigation Measure CUL-MM-2 requires the preparation of a Historic Resources Plan, which has not yet been drafted, to mitigate impacts associated with development of the Project. The mitigation measure itself does not create any binding obligations to preserve Building 35 or any other structure at 1440-1448 North Gower Street. The Draft EIR evaluated impacts to Building 35 for the purposes of assessing any potential impacts to historic resources of the unified Sunset Gower Studios lot. In addition, the building has been identified in a CRA historic resource survey for the Hollywood Redevelopment Area, which as an existing regulatory process requires review of redevelopment of historic resources. Also refer to Response to Comment No. 8-7, below.

Comment No. 8-6

- 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.

Response to Comment No. 8-6

The comment above relates to concerns associated with the accuracy of the Historical Resources Report, which is included in Appendix C of the Draft EIR. Based on a review of building permit records available online through the Los Angeles Department of Building and Safety, the initial building permit for Building 35 (#1949LA29110, 12/8/1949) was filed using the address 1444 Gower Street. The sketch map included on the second page of the permit application confirms that the building associated with the application is Building 35. In addition, the architect noted on the permit is Claud Beelman, and the owner listed is I. E. Chadwick. Furthermore, the Claud Beelman archives include files related to the design of the Chadwick office building at 1440 Gower, which is the address referenced in the commenter's letter. While it is possible that Beelman did other work on the lot as a consulting architect, there is no journalistic record of another architect or designer being

retained for Building 35 and Historic Resources Group's investigation as part of this study did not identify any other architect associated with its initial construction.

Comment No. 8-7

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.

Response to Comment No. 8-7

The comment above relates to concerns associated with designating Building 35 as a contribution structure in the potential historic district. Contributors to a potential historic district are identified and evaluated based on their shared historic identity and historic significance, regardless of ownership and/or property boundaries. As Building 35 was constructed during the period of significance for the potential historic district, was utilized by Columbia Pictures during that same period, and retains sufficient integrity to convey this historic identity and its historic relationship to the studio as a whole, the building was identified as a contributing resource to the historic district.

As with contributors to a potential historic district, character-defining features are identified based on their historic role within the district and their relationship with and importance to the district during the period of significance. These factors are evaluated within the historic context and period associated with the development of the properties comprising the district, regardless of ownership and/or property boundaries. Therefore, the

internal circulation pattern at Sunset Gower Studios is considered a character-defining feature of the historic district.

Although Building 35 may be located outside the studio property as defined by present-day boundaries, historical records confirm that the building nevertheless was considered a part of the studio's facilities and played an important role in the operation of Columbia Pictures during the period of significance associated with the historic district. Further, archival maps and photographs confirm that as a part of the studio's facilities, Building 35 historically functioned as part of the shared spatial organization of the studio as a whole and was unified by the same internal circulation elements.

With regard to the Historical Resources Report, which is included in Appendix C of the Draft EIR, failing 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, alterations to specific contributors are generally not described in detail in the discussion of the overall historic district as a whole. The Historic Resources Group is aware of the subsequent two-story addition to Building 35, for which a building permit was filed in 1955 (#1955LA19918, 7/8/1955) and a certificate of occupancy was filed in 1956 (10/2/1956); as the addition was constructed during the period of significance for the district, it reflects part of the pattern of development of the district as a whole and does not detract from the building's eligibility as a contributor to the district.

Similarly, while the building's entrance has been subsequently remodeled after the conclusion of the period of significance, these alterations reflect changes to only a minor portion of the building's exterior and as such do not detract from the building's eligibility as a contributor to the district. The National Park Service states in National Register Bulletin 15 that it is not necessary for a property to retain all its historic physical features or characteristics; however, the property must retain the essential physical features that enable it to convey its historic identity. As the exterior alterations which were undertaken outside the period of significance are limited to the primary entrance and the building has otherwise remained relatively intact, it continues to retain the essential physical features that define both why and when the building was significant, as required by the National Park Service.

Comment No. 8-8

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.

Response to Comment No. 8-8

The Historical Resources Report, which is included in Appendix C of the Draft EIR, provides a comprehensive analysis of the potential historical resources impacts of the Project. The comment states an opinion that will be forwarded to the decision-makers for their review and consideration.

Comment No. 8-9

- 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?

Response to Comment No. 8-9

As detailed in Section IV.C, Cultural Resources, of the Draft EIR, Mitigation Measure CUL-MM-6 requires implementation of a shoring plan to ensure the protection of adjacent historic resources during construction from damage due to underground excavation and general construction procedures and to reduce the possibility of settlement due to the removal of adjacent soil. A shoring plan will be prepared prior to commencement of Project construction activities and will be shared with the 1440–1448 North Gower Street property owner.

Comment No. 8-10

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

Response to Comment No. 8-10

This comment, which concludes the letter and provides a photo of the Chadwick Property, is noted for the record and will be forwarded to the decision makers for their review and consideration.