

IV. Environmental Impact Analysis

H. Land Use and Planning

1. Introduction

This section analyzes the Project's potential impacts with regard to land use and planning. The analysis in this section evaluates whether the Project would conflict with any land use plan signs, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Analyses of consistency and/or potential conflicts with plans that are more directly related to other environmental topics are addressed in other sections of this Draft EIR. Specifically, Section IV.A, Air Quality, evaluates Project consistency with the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP), and Section IV.K, Transportation, evaluates Project consistency with the City of Los Angeles Mobility Plan 2035 and other transportation-related policy documents.

2. Environmental Setting

a. Regulatory Framework

The following describes the primary regulatory requirements regarding land use and planning. Applicable plans and regulatory documents/requirements include the following:

- California Government Code Section 65302
- Senate Bill 375
- Southern California Association of Governments 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy
- City of Los Angeles General Plan
- Wilshire Community Plan
- Los Angeles Municipal Code
- Citywide Design Guidelines

(1) State

(a) California Government Code Section 65302

California law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals. As stated in Section 65302 of the California Government Code, "The general plan shall consist of a statement of development policies and shall include a diagram or diagrams and text setting forth objectives, principle, standard, and plan proposals." While a general plan will contain the community vision for future growth, California law also requires each plan to address the mandated elements listed in Section 65302. The mandatory elements for all jurisdictions are land use, circulation, housing, conservation, open space, noise, and safety.

(b) Senate Bill 375

On September 30, 2008, Senate Bill (SB) 375 was instituted to help achieve Assembly Bill (AB) 32 goals through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) achievement of greenhouse gas (GHG) emission reduction targets for the transportation sector set forth in AB 32. It establishes a process for the California Air Resource Board (CARB) to develop GHG emission reduction targets for each region (as opposed to individual local governments or households). SB 375 also requires Metropolitan Planning Organizations (MPO) to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses California Environmental Quality Act (CEQA) streamlining as an incentive to encourage residential or mixed-use residential projects, which help achieve AB 32 goals to reduce GHG emissions.

(2) Regional

(a) Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy

On September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also known as Connect SoCal. The 2020–2045 RTP/SCS presents a long-term transportation vision through the year 2045 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The 2020–2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning, and the provision of services by other regional agencies. SCAG's overarching strategy for achieving its goals is

integrating land use and transportation. SCAG policies are directed towards the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system. Rooted in past RTP/SCS plans, Connect SoCal's "Core Vision" centers on maintaining and better managing the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. The plans "Key Connections" augment the "Core Vision" to address challenges related to the intensification of core planning strategies and increasingly aggressive GHG reduction goals, and include but are not limited to, Housing Supportive Infrastructure, Go Zones, and Shared Mobility. Connect SoCal intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and enhancement of the regions' overall quality of life. These benefits include but are not limited to a 5-percent reduction in VMT per capita and vehicle hours traveled by 9 percent, increase in work-related transit trips by 2 percent, create more than 264,500 new jobs, reduce greenfield development by 29 percent, and, building off of the 2016–2040 RTP/SCS, increase the share of new regional household growth occurring in High Quality Transit Areas (HQTAs)¹ by 6 percent and the share of new job growth in HQTAs by 15 percent.

(3) Local

(a) City of Los Angeles General Plan

The City of Los Angeles General Plan (General Plan),² originally adopted in 1974, sets forth goals, objectives, policies, and programs to provide an official guide to the future development of the City, while integrating a range of state-mandated elements,³ including Land Use, Circulation (Mobility Plan 2035), Housing, Conservation, Open Space, Safety, Noise, and Air Quality. The City's General Plan also includes the Framework Element, the Health and Wellness Element (Plan for a Healthy Los Angeles), the Infrastructure Systems Element, and the Public Facilities & Services Element. Both the City's General Plan land use controls and the goals, objectives, and policies within individual elements of the General Plan include numerous provisions that are intended to avoid or reduce potential

¹ HQTAs are corridor-focused areas within 0.5 mile of an existing or planned transit stop or a bus transit corridor with a 15-minute or less service frequency during peak commuting hours.

² City of Los Angeles, Department of City Planning, City of Los Angeles General Plan, <https://planning.lacity.org/plans-policies/general-plan-overview>, accessed March 25, 2022.

³ The term "element" refers to the topics that California law requires to be covered in a general plan (Government Code Section 65302). In addition, State law permits the inclusion of optional elements which address needs, objectives, or requirements particular to that city or county (Government Code Section 65303); for example, an Air Quality Element is not required under Government Code Section 65302.

adverse effects on the environment. The elements that make up the City's General Plan are described in more detail below.

(i) Framework Element

The City of Los Angeles General Plan Framework Element (General Plan Framework) establishes the conceptual basis for the City's General Plan. The General Plan Framework sets forth a Citywide comprehensive long-range growth strategy and establishes Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. The General Plan Framework provides guidelines for future updates of the City's community plans and does not supersede the more detailed community and specific plans.

(1) Land Use Chapter

The General Plan Framework Land Use Chapter designates Districts (i.e., Neighborhood Districts, Community Centers, Regional Centers, Downtown Center, and Mixed-Use Boulevards) that include standards and policies that shape the scale and intensity of proposed uses with the purpose of supporting the vitality of the City's residential neighborhoods and commercial districts. The establishment of the designated arrangement of land uses and development densities addresses an array of environmental issues, including, but not limited to: reductions in VMT, reductions in noise impacts, improved efficiency in the use of energy, improved efficiency and thus greater service levels within the infrastructure systems, availability of open space, compatibility of land uses, support for alternative modes of transportation, and provision of an attractive pedestrian environment.

(2) Housing Chapter

The overarching goal of the General Plan Framework Housing Chapter is to define the distribution of housing opportunities by type and cost for all residents of the City. The General Plan Framework Housing Chapter recognizes that the distribution of housing in proximity to transit can reduce vehicle trips and provide residents with the opportunity to walk between their home, job, and/or neighborhood services. The Housing Chapter provides the following policies to achieve this goal through a number of measures:

- Concentrating opportunities for new development in the City's Neighborhood Districts and in Community Centers, Regional Centers, and the Downtown Center, as well as along primary transit corridors/boulevards;
- Providing development opportunities along boulevards located near existing or planned major transit facilities and areas characterized by low-intensity or

marginally viable commercial uses with structures that integrate commercial, housing, and/or public service uses; and

- Focusing mixed uses around urban transit stations, while protecting and preserving surrounding low-density neighborhoods from the encroachment of incompatible land uses.

(3) Urban Form and Neighborhood Design Chapter

The General Plan Framework Urban Form and Neighborhood Design Chapter establishes the goal of creating a city that is attractive to future investment and a city of interconnected, diverse neighborhoods that builds on the strength of those neighborhoods and functions at both the neighborhood and Citywide scales. The purpose of the Urban Form and Neighborhood Design Chapter is two-fold: first, to support the population distribution principles of the General Plan Framework through proper massing and design of buildings and second, to enhance the physical character of neighborhoods and communities within the City.⁴ The General Plan Framework does not directly address the design of individual neighborhoods or communities but embodies general neighborhood design and implementation programs that guide local planning efforts and lay a foundation for community plan updates. The Urban Form and Neighborhood Design Chapter encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service. The existing and planned transit system provides the opportunity to concentrate development and conserve the existing character of stable neighborhoods.

(4) Open Space and Conservation Chapter

The General Plan Framework Open Space and Conservation Chapter provides guidance for overall City provision of open space and sets forth policies for the protection of the City's natural environment resources. The Open Space and Conservation Chapter's objectives are oriented around the conservation of natural resources, provision of outdoor recreational opportunities, minimization of public risks from environmental hazards, and use of open space to enhance community and neighborhood character. Economic, social, and ecological imperatives require the City to take full advantage of all existing open space elements. The ecological dimension is based on the improvement of water quality and supply, the reduction of flood hazards, improved air quality, and the provision of ecological corridors for birds and wildlife

⁴ City of Los Angeles General Plan Framework, p. 5-1, et. seq.

(5) Economic Development Chapter

The General Plan Framework Economic Development Chapter includes goals, policies and objectives that address the appropriate land use locations for development. The chapter also establishes mutual development objectives for land use and economic development. This Chapter set forth policies for the development of an infrastructure investment strategy to support population and employment growth areas. The Chapter also includes goals, objectives, and policies focused on preserving commercial uses within walking distance to residential areas, and promoting opportunities in areas where growth can be accommodated without encroaching on residential neighborhoods. It also focuses on establishing a balance of land uses that provide for commercial and industrial development which meet the needs of local residents, sustaining economic growth, and assuring maximum feasible environmental quality.

(6) Transportation Chapter

The General Plan Framework Transportation Chapter includes proposals for major improvements to enhance the movement of goods and to provide greater access to major intermodal facilities. While the focus of the Transportation Chapter is on guidance for transportation investments, the Transportation Chapter also includes goals, policies and objectives that overlap with policies included in other Framework chapters of the General Plan Framework regarding land use patterns and the relationship of the pedestrian system to arrangement of land uses. The Transportation Chapter of the General Plan Framework is implemented through the General Plan's Mobility Plan 2035 (Mobility Plan), which is a comprehensive update of the General Plan Transportation Element.

(7) Infrastructure and Public Services Chapter

The General Plan Framework Infrastructure and Public Services Chapter addresses infrastructure and public service systems, including wastewater, stormwater, water supply, solid waste, police, fire, libraries, parks, power, schools, telecommunications, street lighting, and urban forests. For each of the public services and infrastructure systems, basic policies call for monitoring service demands and forecasting the future need for improvements, maintaining an adequate system/service to support the needs of population and employment growth, and implementing techniques that reduce demands on utility infrastructure or services. Generally, these techniques encompass a variety of conservation programs (e.g., reduced use of natural resources, increased site permeability, watershed management, and others). Strategic public investment is advocated in the Infrastructure and Public Services Chapter as a method to stimulate economic development as well as maintain environmental quality. Attention is also placed on the establishment of procedures for the maintenance and/or restoration of service after emergencies, including earthquakes.

(ii) Transportation Element

The Transportation Element (Mobility Plan), adopted on January 20, 2016, and readopted September 7, 2016, is a comprehensive update of the General Plan Transportation Element. The Mobility Plan 2035 provides the policy foundation for achieving a transportation system that balances the needs of all road users, incorporates “complete streets” principles and lays the policy foundation for how future generations of Angelenos interact with their streets, in compliance with the Complete Streets Act (AB 1358).

The purpose of the Mobility Plan is to present a guide to the future development of a Citywide transportation system for the efficient movement of people and goods. While the Mobility Plan focuses on the City’s transportation network, it complements other components of the General Plan that pertain to the arrangement of land uses to reduce VMT and policies to support the provision and use of alternative transportation modalities. The Mobility Plan includes the following five main goals that define the City’s high-level mobility priorities:

- Safety First;
- World Class Infrastructure;
- Access for All Angelenos;
- Collaboration, Communication, and Informed Choices; and
- Clean Environments and Healthy Communities.

(iii) Conservation Element

The City of Los Angeles General Plan includes a Conservation Element, which addresses the preservation, conservation, protection, and enhancement of the City’s natural resources. Section 5 of the Conservation Element recognizes the City’s responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes an objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes and a corresponding policy to continue protecting historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities. The Conservation Element refers to the Open Space Element for a discussion of open space aspects of the City, including park sites.

(iv) Wilshire Community Plan

The City's 2001 Wilshire Community Plan (Community Plan), which covers the Wilshire area, is the land use element of the General Plan applicable to the Wilshire Community Plan. The Community Plan implements the General Plan Framework and includes land use designations, density limits, building heights and other provisions to implement the development that supports the City's policies and development vision for the future. Seventeen primary goals and associated objectives and policies are identified in the Wilshire Community Plan that address issues such as long-term stability, community character, transportation, fire protection and police services.

The Community Plan's land use designations for the Project Site are Community Commercial, Neighborhood Commercial, and Limited Commercial, as shown in Table IV.H-1 on page IV.H-9 and on Figure IV.H-1 on page IV.H-10. The land use designation for the approximately 0.63-acre unincorporated County parcel is Major Commercial per the Los Angeles County 2035 General Plan. The Project's consistency with the applicable goals, objectives, and policies in the Community Plan adopted for the purpose of avoiding or mitigating an environmental impact is discussed in the impact analysis below. To support that discussion, a detailed list of the goals, objectives, and policies of the Community Plan applicable to the Project is provided in Table 2 of Appendix I of this Draft EIR, along with an analysis of the Project's consistency with each particular goal, objective, or policy.

(b) Los Angeles Municipal Code

All development activity on the Project site is subject to the City of Los Angeles Municipal Code (LAMC), particularly Chapter 1, General Provisions and Zoning, also known as the City of Los Angeles Planning and Zoning Code. The LAMC defines the range of zoning classifications throughout the City, provides the specific permitted uses applicable to each zoning designation, and applies development regulations to each zoning designation. As shown in Table IV.H-1 and on Figure IV.H-2 on page IV.H-11, APNs 5512-001-003 and 5512-002-002 are zoned C2 1-O (Commercial, Height District 1, Oil Drilling Overlay), while APN 5512-002-009 is zoned C2-1-O and C1.5-2D-O (Limited Commercial, Height District 2 subject to a Development Limitation, Oil Drilling Overlay). The unincorporated County parcel, APN 5512 002-001, is zoned C-MJ (Major Commercial) under the Los Angeles County Code. The Project Site is also located in a City-designated Transit Priority Area (TPA) as well as a Tier 3 Transit-Oriented Community (TOC), although no residential uses are proposed as part of the Project.

(c) Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the General Plan Framework's urban design principles and are intended to be used by City of Los Angeles Department of City Planning staff, developers, architects, engineers, and community members in

**Table IV.H-1
Existing Project Site Land Use and Zoning Summary**

Parcel	Land Use Designation per Community Plan	Zoning Designation
APN 5512-001-003	Community Commercial	C2-1-O
APN 5512-002-002	Neighborhood Commercial	C2-1-O
APN 5512-002-009	Limited Commercial	C2-1-O and C1.5-2D-O
APN 5512-002-001 ^a	Major Commercial	C-MJ
<p>C2-1-O: <i>Commercial, Height District 1, Oil Drilling Overlay</i></p> <p>C1.5-2D-O: <i>Limited Commercial, Height District 2 subject to a Development Limitation, Oil Drilling Overlay</i></p> <p>C-MJ: <i>Major Commercial</i></p> <p>^a <i>Located in unincorporated Los Angeles County and proposed for annexation to the City. Land use designation is per the Los Angeles County 2035 General Plan, and zoning designation is per Title 22 (Planning and Zoning) of the Los Angeles County Code.</i></p> <p><i>Source: Burns & Bouchard, Inc.; City of Los Angeles Zone Information and Map Access System (ZIMAS), 2021.</i></p>		

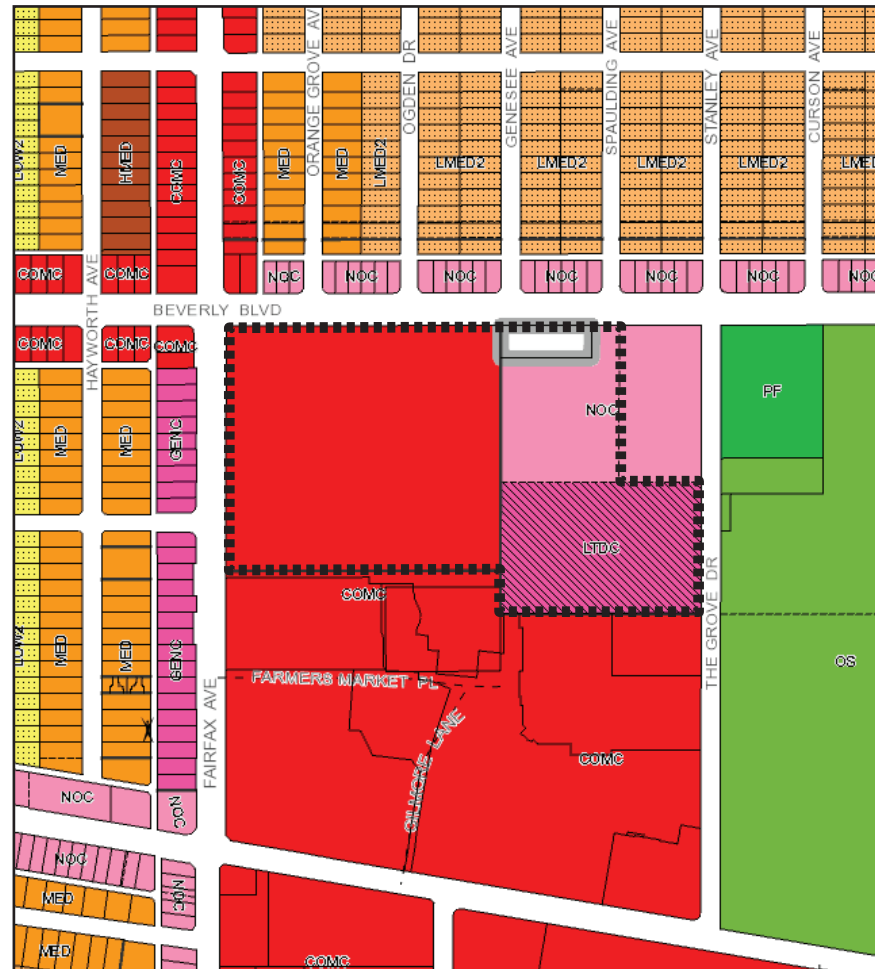
evaluating project applications, along with relevant policies from the General Plan Framework and Community Plans. By offering more direction for proceeding with the design of a project, the Citywide Design Guidelines illustrate options, solutions, and techniques to achieve the goal of excellence in new design. The Citywide Design Guidelines, which were initially adopted by the City Planning Commission in July 2013 and updated in October 2019, are intended as performance goals and not zoning regulations or development standards and, therefore, do not supersede regulations in the LAMC. The guidelines “carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions” and are organized in relation to Pedestrian-First Design, 360 Degree Design, and Climate-Adapted Design. The Citywide Design Guidelines incorporate the goals of the previous Walkability Checklist and interact with other guidelines such as those found in Community Design Overlays.

b. Existing Conditions

(1) Project Site

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is bounded by Beverly Boulevard to the north; The Grove Drive to the east; a private drive to the south (the eastern portion of which is referred to herein as the Southern Shared Access Drive, which is accessed from The Grove Drive and separates the Project Site from the

EXISTING



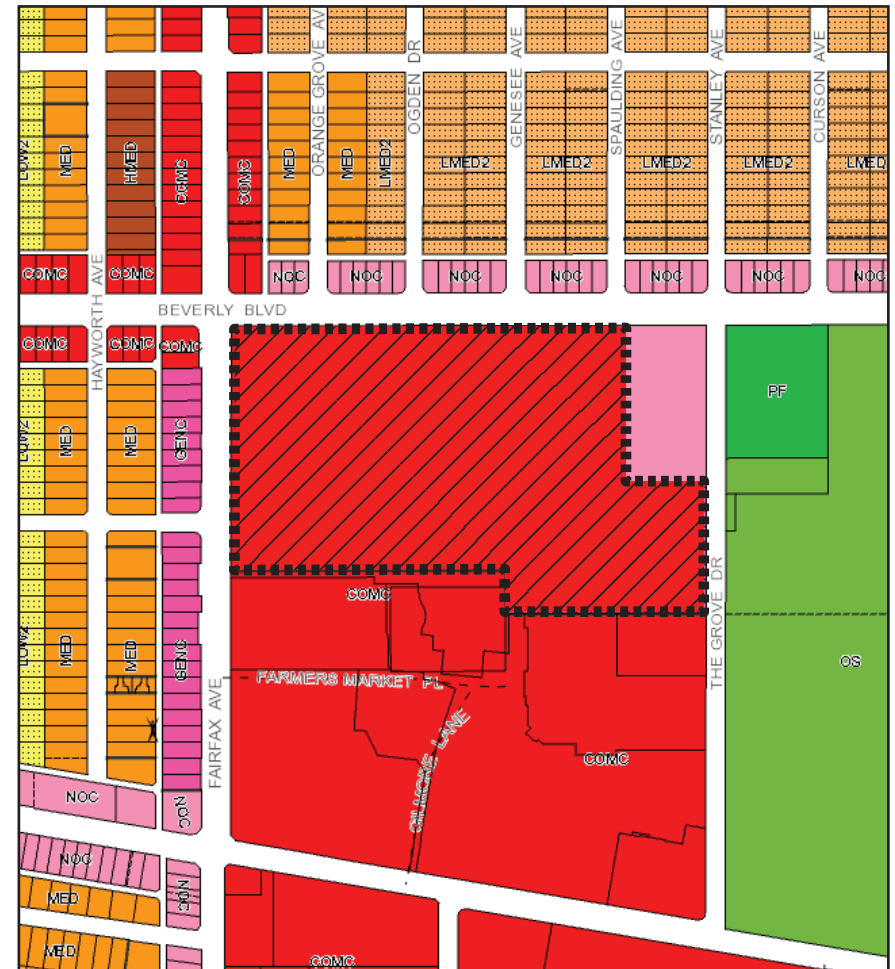
Project Site Boundary

GENERAL PLAN LAND USE

RESIDENTIAL

- Low II Residential
- Low Medium II Residential
- Medium Residential
- High Medium Residential

PROPOSED



COMMERCIAL

- Limited Commercial
- Neighborhood Commercial
- General Commercial
- Community Commercial
- Regional Center Commercial

OPEN SPACE / PUBLIC FACILITIES

- Open Space
- Public Facilities

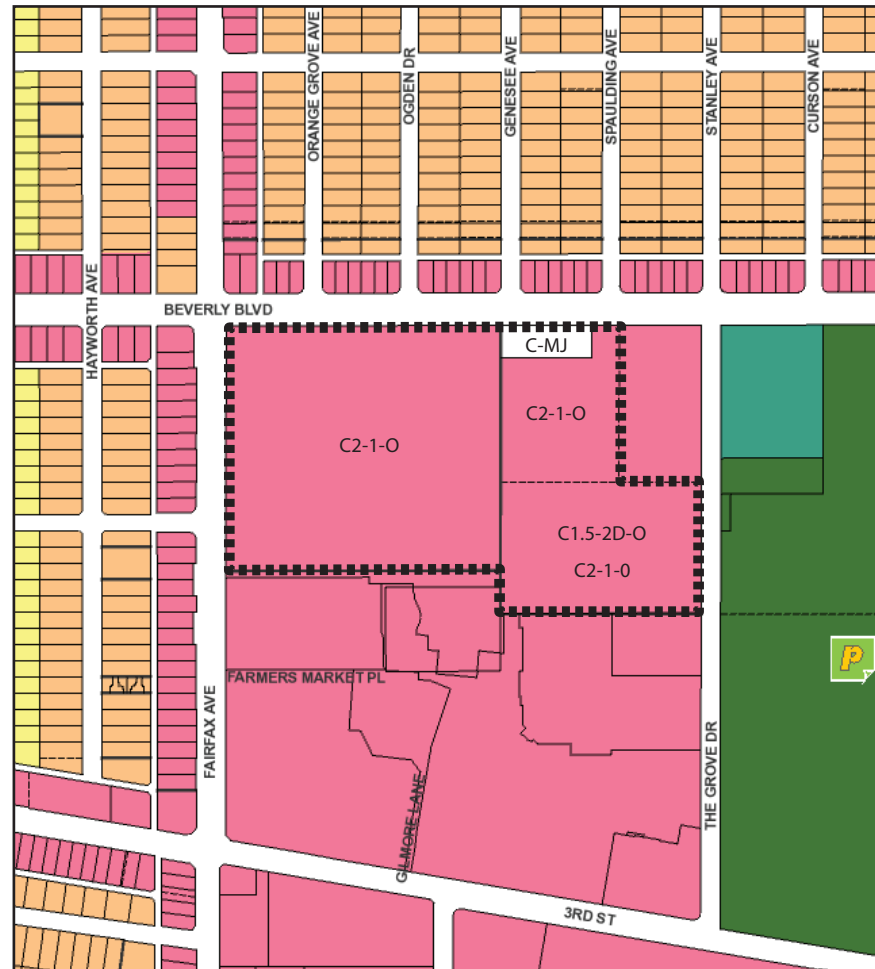
COUNTY PARCEL

- Major Commercial

Figure IV.H-1


Existing and Proposed Land Use Designations

EXISTING



 Project Site Boundary

ZONING

 OS
  R1V3
  R3, R4, RAS4, RD1.5
  C1, C1.5, C2
  PF
  TVC 2050 SPECIFIC PLAN ZONE
  SN SIGN DISTRICT

PROPOSED

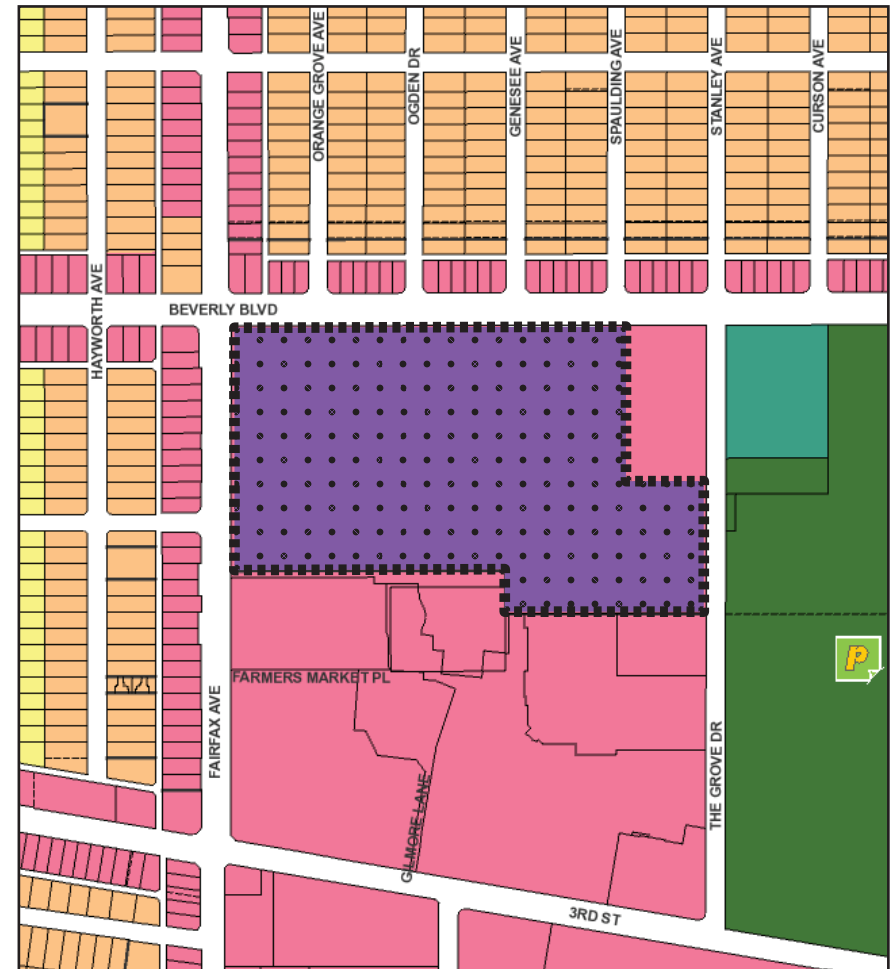


Figure IV.H-2

Existing and Proposed Zoning

adjacent commercial properties to the south);⁵ and Fairfax Avenue to the west. The Project Site is currently developed with approximately 743,680 square feet of studio-related uses, including approximately 95,540 square feet of sound stage uses; 325,450 square feet of production support uses, such as storage and mills; 163,090 square feet of production office space; and 159,600 square feet of general office space. As shown in the aerial photograph provided in Figure II-3 of Section II, Project Description, the existing development on-site is comprised of four main buildings, described further below. The Project Site also contains approximately 30 ancillary buildings and temporary structures, primarily located in the southeastern corner, including storage buildings, modular/portable bungalows and trailers, shelters and pads for utilities and transmission equipment, carparks with solar panels, guard houses, and a helipad.

Television City supports a variety of production activities focused on the creation, development, recording, broadcasting, and editing of recorded and live television programming and other audio, visual, and digital media including, but not limited to, e-sports, backlot shooting, and other forms of content creation. Such activities occur both indoors and outdoors within the Project Site and include basecamp areas where mobile facilities such as trucks, generators, and support vehicles related to production are temporarily staged.⁶ As is typical of studio environments, the land uses are centered around production operations, including associated parking, loading, and storage.

Television City was originally developed in 1952 in accordance with a master plan designed by the local architectural team of William Pereira and Charles Luckman (Pereira & Luckman). The master plan was conceived to function as a plan for a major studio headquarters located within a flexible studio environment and was designed to be adaptable and expandable over time to meet the changing needs of the entertainment industry. The original Primary Studio Complex, located generally in the center of the Project Site, includes two attached buildings designed in the International style—the Service Building on the east and the Studio Building on the west—that are designated as Historic-Cultural Monument (HCM) No. 1167 (CHC-2018-476-HCM).^{7,8} The main entrance

⁵ The Southern Shared Access Drive is a privately-owned right-of-way that is partially located on the Project Site and partially located off-site on the adjacent properties to the south. While not a component of the Project, the Southern Shared Access Drive provides shared access to the Project Site and the adjacent properties to the south from The Grove Drive. Refer to Figure II-3 in Section II, Project Description, of this Draft EIR for an illustration.

⁶ Basecamps are flexible production staging areas where mobile facilities such as trucks, generators, and support vehicles related to production are temporarily staged. Within the Project Site, basecamp activities typically occur within existing surface parking areas and other open space areas.

⁷ The Primary Studio Complex was formally designated as HCM No. 1167 by the City Council on June 26, 2018.

to the Primary Studio Complex includes a distinctive bridge over an area of lower grade, covered by a canopy featuring the “Television City” sign at the bridge entrance facing north. The Primary Studio Complex was constructed as the first phase of the Pereira & Luckman master plan, which called for the eventual development of 2.5 million square feet with multi-story office towers up to 12 stories in height fronting Beverly Boulevard and Fairfax Avenue, a long retail block along Beverly Boulevard, and 24 stages. This full expansion under the Pereira & Luckman master plan was never realized, and the original four sound stages within the Primary Studio Complex have undergone additions, exterior alterations, and ongoing reconfiguration of interior spaces, reflecting the original design intent for flexibility as production demands evolved over time.

Following the development of the Primary Studio Complex in 1952, substantial expansions of on-site development occurred in and around 1969 and 1976 to allow for more stage, production support, and production office space. The Service Building was extended to the east with additions in 1969, and the Support Building was added to the west elevation of the Studio Building in 1976. Other alterations to the Primary Studio Complex over subsequent decades have involved several additions to the roof and ongoing changes in the use of interior spaces, such as the construction of additional production office space, conversion of the original rehearsal halls into stage space, a remodel of the primary entry lobby, addition of a commissary, and other conversions of interior and exterior spaces to meet production needs such as basecamp and audience experience uses.

Beyond the Primary Studio Complex, numerous ad hoc additions and modifications have been made to the Project Site to accommodate the evolving needs of studio operations and the increasing demand for production space. A myriad of production office and support buildings, basecamp trailers, and bungalows were constructed to meet day-to-day production needs and create a modernized studio campus. In 1993, the three-story, detached East Studio Building was completed, which contained stage, production support, and production office uses. In addition, the original lawn and lower landscaped terrace along Beverly Boulevard were removed and replaced to accommodate parking, basecamp, and circulation needs. Further, the Project Site today includes photovoltaic canopies within the surface parking lots along Beverly Boulevard and Fairfax Avenue and perimeter security fencing with visual screening to meet safety and privacy needs.

Existing studio parking is provided in surface lots that are located primarily along the perimeter of the Project Site. The current parking supply is approximately 1,510 spaces.

⁸ Please refer to Section IV.B, Cultural Resources, of this Draft EIR for a detailed discussion of the Primary Studio Complex.

Access to the Project Site is provided at multiple points around the perimeter, including the following: (1) three driveways and one pedestrian gate along Beverly Boulevard;⁹ (2) two driveways and one pedestrian gate along Fairfax Avenue; (3) a pedestrian gate along The Grove Drive; and (4) one pedestrian gate along the southern property line. All vehicular and pedestrian entrances and exits include internal controlled access, and a series of drive aisles and sidewalks provide access throughout the Project Site.

The Project Site perimeter is enclosed with chain link, wrought iron, and/or combination block wall/chain link fencing, much of which is lined with trees, shrubs, bougainvillea and climbing vines, and segments of which include green screening. Additional landscaping within the Project Site interior includes limited trees, succulents and shrubs, and some of the parking areas include landscaped infiltration basins. Street trees are located along Beverly Boulevard and Fairfax Avenue. Additionally, while the public sidewalks around the Project Site perimeter range from 9 to 15 feet wide, the areas accessible to pedestrians are as narrow as 3 to 4 feet along portions of The Grove Drive and Fairfax Avenue. Further, the sidewalk widths along The Grove Drive and Fairfax Avenue do not meet current City standards.

In terms of topography, the Project Site slopes gently downward from the northeast to the southwest. The existing Project Site elevations range from approximately 185 to 201 feet above mean sea level (AMSL). The Primary Studio Complex, where the main production facilities are located, is at an elevation of 201 feet AMSL, which is referred to herein as Project Grade.¹⁰

(2) Surrounding Uses

The Project Site is located in an urbanized area that is developed with a diverse mix of land uses. In general, the major arterials in the Project vicinity, including Beverly Boulevard, 3rd Street, and Fairfax Avenue, are lined with commercial, institutional, and multi-family residential uses, with mixed residential neighborhoods interspersed between the major arterials. Immediately east of the Project Site is a six-story apartment complex, Broadcast Center Apartments, which includes a ground floor grocery store and café. To the east, across The Grove Drive, is a U.S. Post Office and Pan Pacific Park, which includes a variety of active and passive recreational uses, an outdoor amphitheater, and the Holocaust Museum LA. To the south are regional-scale commercial uses, including The Grove, an outdoor shopping and entertainment center that includes groupings of one- to three-story retail shops, a movie theater, restaurants, and a seven-level (plus

⁹ Two of the driveways are existing curb cuts that are not currently used for access.

¹⁰ Project Grade is established at an elevation of 201 feet AMSL, which represents the base level of production activity and a substantial portion of the existing topographic elevation of the Project Site.

rooftop) parking garage; The Original Farmers Market, with one- and two-story restaurants and other food-related businesses, including a four-story mixed-use office and retail building; as well as the approximately four-story Farmers Market Storage Facility (which is roughly the same height as the adjacent seven-level garage), the Gilmore Adobe, and surface parking. Further to the south across 3rd Street are a shopping center with surface parking, four- and five-story residential buildings, as well as Hancock Park Elementary School and several 13-story apartment buildings at Park La Brea. Along Fairfax Avenue to the immediate west are low-rise community-serving commercial uses, including a gas station, bank, dry cleaner, and several restaurants and retail stores, interspersed with small surface parking lots, and low- to mid-rise apartments further to the west, as well as Fairfax High School along Fairfax Avenue to the north. Similar development of up to three stories is located to the north along Beverly Boulevard, including retail shops, restaurants, a bank, gas station, religious temple, several small hotels, and personal fitness facilities, with low-rise apartments further north. Many of the streets in the Project vicinity are lined with trees, with Beverly Boulevard and Fairfax Avenue also exhibiting substantial commercial signage, including, but not limited to, large billboard signage.

3. Project Impacts

a. Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, the Project would have a significant impact related to land use if it would:

Threshold (a): Physically divide an established community; or

Threshold (b): Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

For this analysis, the Appendix G thresholds listed above are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G threshold questions.

The L.A. CEQA Thresholds Guide identifies the following criteria to evaluate land use:

(1) Land Use Consistency

- Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site; and
- Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.

(2) Land Use Compatibility

- The extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area;
- The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided, or isolated, and the duration of the disruptions; and
- The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the project.

b. Methodology

The analysis of potential land use impacts considers the Project's consistency with applicable plans, policies, and regulations that regulate land use on the Project Site, as well as the compatibility of the proposed uses with surrounding land uses.

(1) Land Use Policy Consistency

CEQA Guidelines Section 15125(d) requires that an EIR include a discussion of any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans. Separately, CEQA Guidelines Appendix G recommends that a lead agency consider whether the project would cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Importantly, a conflict between a project and an applicable plan is not necessarily a significant impact under CEQA unless the inconsistency will result in an adverse physical change to the environment that is a "significant environmental effect" as defined by CEQA Guidelines Section 15382. As provided in CEQA Guidelines Section 15126.2(a), "an EIR shall identify and focus on the significant effects of the proposed project on the environment." An excerpt from the legal practice guide, Continuing Education of the Bar, Practice Under the California Environmental Quality Act, Section 12.34 illustrates the point:

An inconsistency between a proposed project and an applicable plan is a legal determination not a physical impact on the environment. ...[I]f a project affects a river corridor, one standard for determining whether the impact is significant might be whether the project violates plan policies protecting the corridor; the environmental impact, however, is the physical impact on the river corridor.

Analysis of conflicts and consistency with applicable plans is included in this section of the Draft EIR. Under state Planning and Zoning Law (Government Code Section 65000, et seq.), strict conformity with all aspects of a plan is not required. Generally, plans reflect a range of competing interests, and agencies are given great deference to determine consistency with their own plans. A proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct other policies.¹¹ Generally, given that land use plans reflect a range of competing interests, a project should be compatible with a plan's overall intent but need not be in perfect conformity with every plan policy. More specifically, according to the ruling in *Sequoiah Hills Homeowners Association v. City of Oakland*, state law does not require an exact match between a project and the applicable general plan. Rather, to be "consistent," the project must be "compatible with the objectives, policies, general land uses, and programs specified in the applicable plan," meaning that a project must be in "agreement or harmony" with the applicable land use plan to be consistent with that plan.¹²

(2) Land Use Compatibility

The intent of the compatibility analysis is to determine whether a project would be compatible with surrounding uses in relation to use, size, intensity, density, scale, and other physical and operational factors. The analysis is also intended to determine whether existing communities or land uses would be disrupted, divided, or isolated by a project, with consideration given to the duration of any disruptions. The compatibility analysis may be based on aerial photography, land use maps, and field surveys in which surrounding uses have been identified and characterized. The analysis addresses general land use relationships and urban form based on a comparison of existing land use relationships in the vicinity of the Project Site under existing conditions, at the time the Notice of Preparation was issued, to the conditions that would occur with Project implementation.

¹¹ Office of Planning and Research (OPR), State of California General Plan Guidelines (2017).

¹² *Sequoiah Hills Homeowners Association v. City of Oakland* (1993) 23 Cal.App.4th 704, 719.

c. Project Design Features

The Project includes the following Project Design Features related to cultural resources, as set forth in Section IV.B, Cultural Resources, of this Draft EIR, which also relate to the land use analysis herein:

Project Design Feature CUL-PDF-1: Project Parameters—The following Project Parameters set forth the maximum permitted development footprint and building heights for new adjacent construction and additions to the Primary Studio Complex to ensure that the historic significance of the Primary Studio Complex is not adversely impacted by new construction. These Project Parameters will not limit the land uses or floor areas permitted under the proposed Specific Plan. Conceptual diagrams illustrating the Project Parameters set forth below are included in Section 9 of the Historical Resources Technical Report—TVC 2050 Project (Historic Report), provided in Appendix C of the Draft EIR.

Rehabilitation of the Primary Studio Complex and new construction adjacent to the Primary Studio Complex will comply with the following Project Parameters:

Rehabilitation of the Primary Studio Complex

- Preserve the existing character-defining features of the Primary Studio Complex, as detailed in designated Historic-Cultural Monument (HCM) No. 1167 (CHC-2018-476-HCM), and restore those character-defining features which, in some cases, have been compromised in the past (prior to this Project).¹³
- Remove the non-historic Support Building addition on the west side of the Studio Building, thereby restoring the original volume of the Studio Building, revealing the currently obstructed portions of the Studio Building's original west wall and restoring areas that have previously been removed.
- Remove up to two bays of the Studio Building's west wall to allow for an interior east-west passage through the Primary Studio Complex.
- Remove the non-historic Mill Addition constructed in 1969 on the east side of the Service Building.

¹³ The character-defining features of the Primary Studio Complex are set forth in the findings that were adopted as part of the HCM designation (CHC-2018-476-HCM), which is included in Appendix C of the Historic Report.

- Retain and rehabilitate the three-story office portion of the Service Building and its steel frame and glass curtain walls on the primary (north) and east façades.
- Remove the portion of the Service Building south of the three-story office, much of which has been altered since 1963.
- Replace the portion of the Service Building south of the three-story office with new construction that partially restores the original volume of the Service Building.
- Remove and/or extend the south façade of the Studio Building by up to 20 feet south.
- Remove portions of the roof of the Studio Building above the interior east-west passage to create a partial open-air corridor.

Rooftop Addition above the Primary Studio Complex

- Design any rooftop addition as a single rectangular volume.
- Design any rooftop addition to be a separate and distinct volume rather than as an integrated extension of the Primary Studio Complex.
- Limit the height of any rooftop addition to 36 feet in height when measured from the top of the parapet of the Studio Building (approximately 84 feet above Project Grade) to the roof of the rooftop addition.
- Set back any rooftop addition a minimum of 55 feet from the north façade of the Studio Building.
- Engineer the structural support of any rooftop addition so that it could be removed without impairing the essential form and integrity of the Primary Studio Complex.

Adjacent New Buildings

- Locate new buildings immediately adjacent to the Primary Studio Complex to the east and south of the Service Building and to the west of the Studio Building.
- For any new construction immediately east of the Service Building that exceeds the height of the Service Building, any occupiable structure will be set back southerly from the north façade of the Service Building by a minimum of 60 feet and separated from the east façade of the Service Building by a minimum of 15 feet.
- For any new construction immediately west of the Studio Building that exceeds the height of the Service Building, any occupiable structure will be set back southerly from the north façade of the Service Building by a minimum of 150 feet and separated from the west façade of the Studio Building by a minimum of 10 feet.

- Limit new construction on the west and east of the Primary Studio Complex to 225 feet in height above Project Grade.
- Design new construction to the west and east of the Primary Studio Complex as distinct volumes.
- Permit up to six open-air bridges at the interior floor levels (three on the east and three on the west) to provide pedestrian access to the Primary Studio Complex and any rooftop addition from the adjacent new buildings.

Project Design Feature CUL-PDF-2: Historic Structure Report—The Applicant will prepare a Historic Structure Report (HSR) that will further document the history of the Primary Studio Complex and guide its rehabilitation in compliance with the Secretary of the Interior's Standards for Rehabilitation (Rehabilitation Standards). The HSR will be completed prior to the development of the architectural and engineering plans for the Project. The HSR will be prepared based upon the National Park Service's Preservation Brief #43: The Preparation and Use of Historic Structure Reports. The HSR will thoroughly document and evaluate the existing conditions of the character-defining features of the Primary Studio Complex and make recommendations for their treatment. The HSR will also address changes to the buildings to suit new production techniques and modern amenities as well as their on-going maintenance after Project completion. The HSR will set forth the most appropriate approach to treatment and outline a scope of recommended work before the commencement of any construction. As such, the report will serve as an important guide for the rehabilitation of the Primary Studio Complex and will provide detailed information and instruction above and beyond what is typically available prior to the rehabilitation of a historical resource.

In addition, specific Project elements that are especially relevant to this land use analysis are described below.

(1) TVC 2050 Specific Plan

The TVC 2050 Project would establish the TVC 2050 Specific Plan (Specific Plan) to allow for the modernization and expansion of media production facilities within the approximately 25-acre Television City studio. The proposed Specific Plan would permit a total of up to a maximum 1,874,000 square feet of sound stage, production support, production office, general office, and retail uses within the Project Site upon buildout, as

well as associated circulation improvements, parking, landscaping, and open space.¹⁴ More specifically, as detailed in Table II-2 in Section II, Project Description, of this Draft EIR, the Specific Plan would permit up to 1,626,180 square feet of new development, the retention of up to 247,820 square feet of existing uses, and the demolition of up to 495,860 square feet of existing media production facilities. In addition, the TVC 2050 Sign District (Sign District) would be established to permit studio-specific on-site signage.

The Specific Plan would establish development guidelines and standards to regulate basic planning, design, and development concepts for future development within the Project Site. These development guidelines and standards would provide a measure against which specific future development proposals could be evaluated. As such, the proposed Specific Plan would create a regulatory framework that accounts for the special requirements of a working production studio and its specialty uses and provides flexibility to address potential future changes in technology and space requirements inherent to the rapid pace of entertainment technology's advancement. The primary development regulations set forth in the Specific Plan would address land use, height, floor area, frontage areas, building setbacks, design, historic preservation, childcare, alcohol sales, and parking, as well as associated implementation procedures. The regulations set forth in the proposed Specific Plan are summarized below.

The conceptual site plan provided in Figure II-4 in Section II, Project Description, of this Draft EIR provides an illustration of a potential development program within the Project Site in conformance with the proposed Specific Plan. The conceptual site plan represents a reasonable scenario of how buildout of the Project Site may occur based on current market conditions and the needs identified for the Project Site. Actual development would be governed by the requirements of the proposed Specific Plan and not the conceptual site plan. The specific mix of uses ultimately constructed would depend upon market demands, and the Specific Plan would allow for flexibility in locating the various uses within the Project Site. The Specific Plan would also allow for the exchange of certain permitted land uses through a land use exchange procedure, as set forth in the Specific Plan and described below. The Specific Plan is intended to allow Television City to adapt and evolve over time in a manner that honors and realizes the legacy of the original Pereira &

¹⁴ As defined in the Specific Plan, floor area is the area in square feet confined within the interior face of the exterior walls of a building, but not including the area of the following: exterior walls; stairways; shafts; light courts; bicycle parking (covered); rooms housing building-operating equipment or machinery; basement and ground floor (covered) storage areas; recycling or waste management equipment or machinery; parking areas with associated driveways and ramps; areas related to the Mobility Hub; outdoor eating areas (covered or uncovered); trellis and shade structures; covered canopies; existing marquees and walkways (covered); outdoor production areas; buildings wholly constructed to house mechanical, plumbing, electrical, or other co-generation and storm water equipment; production trailers; basecamp areas; temporary uses; and sets/façades.

Luckman master plan and rehabilitates and preserves the integrity of the HCM, while achieving the Project objectives.

Buildout under the Specific Plan could take place in one phase over a 32-month period or could occur in phases over up to a 20-year period. The Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043.

(a) Permitted Land Uses

As shown in Table II-2 in Section II, Project Description, of this Draft EIR, the proposed Specific Plan would allow for a total of up to a maximum of 1,874,000 square feet of new sound stages, production support, production office, general office, and retail uses within the Project Site, with adjustments permitted subject to the land use exchange provisions set forth in the Specific Plan, discussed below.¹⁵ The types of land uses and facilities permitted on-site would be set forth in the Specific Plan. These would include such uses as motion picture, television, and broadcast studios and related uses, including, but not limited to: production activities; indoor and outdoor stages; sets and façades; digital, film, video, audio, video game, and media production; recording and broadcasting; sound labs; film editing; film video and audio processing; sets and props production; computer design; computer graphics; animation; and ancillary facilities related to those activities. The following types of related uses and facilities would also be permitted, as detailed in the Specific Plan:

- Basecamps
- Communication facilities
- Conference facilities
- Modular offices and trailers (temporary or permanent)
- Studio support facilities
- Parking
- Various ancillary commercial and retail uses to serve the on-site employees and visitors
- Catering facilities

¹⁵ Proposed floor area would be calculated pursuant to the definition of floor area in the proposed Specific Plan.

- Special events
- Audience and entertainment shows
- Museum exhibits
- Theaters
- Childcare facilities
- Educational facilities
- E-sports
- Fitness facilities
- Emergency medical facilities to serve on-site employees and visitors
- Infrastructure
- Maintenance and storage facilities
- Mills/manufacturing
- Overnight sleeping quarters for certain on-site personnel
- Recreational facilities
- Restaurants and special event areas including the sale of alcoholic beverages
- Security facilities
- Signs
- Warehouses
- Transportation facilities, including a Mobility Hub and helipad
- Fueling stations and vehicle repair related to on-site uses and activities
- Medical offices (including emergency medical facilities)
- All other uses permitted in the C2 zone unless expressly prohibited in the Specific Plan

The Specific Plan would permit the development of up to a maximum of 1,874,000 square feet (including existing uses to remain) and a maximum floor area ratio (FAR) not to exceed 1.75:1.

(b) Land Use Exchange

The Specific Plan would provide development flexibility by allowing for exchanges between certain categories of permitted land uses and associated floor areas in order to respond to the future needs and demands of the entertainment industry. Specifically, floor area from any permitted land use category may be exchanged for additional sound stage and production support uses as long as the limitations set forth in the Specific Plan are met. In addition, the total permitted floor area on-site could not exceed 1,874,000 square feet. The permitted adjustments would be limited by the Specific Plan as follows:

- The permitted sound stage floor area may be increased from 350,000 square feet up to a total of 450,000 square feet in exchange for decreases in other uses.
- The permitted production support floor area may be increased from 104,000 square feet in exchange for decreases in other uses.
- The total permitted floor area for production office uses must not exceed 700,000 square feet.
- The total permitted floor area for general office uses must not exceed 700,000 square feet.
- The total permitted floor area for retail uses must not exceed 20,000 square feet.
- The total Project floor area must not exceed 1,874,000 square feet or a sitewide FAR of 1.75:1.

Specific proposals for development that involve a land use exchange would require review by the Director of the Department of City Planning. This process would entail a determination of whether the development proposal complies with the Specific Plan regulations and mitigation measures set forth in the Mitigation Monitoring Program for the Project and whether the environmental impacts resulting from the proposed development would be within the envelope of impacts identified in this EIR.

(c) Height Zones

The Specific Plan would establish height zones with specified height limits to regulate building heights throughout the Project Site.¹⁶ As shown in Figure II-5 in Section II, Project Description, of this Draft EIR and described below, much of the Project Site would be subject to a base height limit of 88 feet as measured from Project Grade (i.e., 201 feet AMSL), consistent with the height of the existing HCM on-site. This base height

¹⁶ Height is measured from Project Grade (i.e., 201 feet AMSL).

limit would be augmented with maximum height limits in limited portions of certain height zones.¹⁷ Each of the height zones is described below and summarized further in Table II-3 in Section II, Project Description, of this Draft EIR.

- **Height Zone A—58-Foot Height Limit (Viewshed Restoration Area):** Height Zone A extends 430 feet along Beverly Boulevard from 7811 Beverly Boulevard on the west to Genesee Avenue on the east and extending southward toward the Primary Studio Complex. Height Zone A is not subject to a base height limit of 88 feet but rather would limit building height to approximately 58 feet or two-thirds of the 88-foot height of the existing HCM, consistent with the HCM designation, across the entirety of the Height Zone A area.
- **Height Zone B—130-Foot Height Limit:** Located within the southeast portion of the Project Site, Height Zone B is not subject to a base height limit of 88 feet but rather allows a height limit of 130 feet within the entirety of the Height Zone B area.
- **Height Zone C—88-Foot Base Height Limit and 160-Foot Maximum Height Limit:** Located along the western side and in the northwest and northeast sections of the Project Site, Height Zone C is subject to a base height limit of 88 feet and allows a maximum height of 160 feet within up to 40 percent of the Height Zone C area.
- **Height Zone D—88-Foot Base Height Limit and 225-Foot Maximum Height Limit:** Located within the central and southern portion of the Project Site, Height Zone D is subject to a base height limit of 88 feet and allows a maximum height of 225 feet within up to 40 percent of the Height Zone D area.
- **Height Zone E—84-Foot Height Limit:** Height Zone E is a rooftop zone that extends a length of approximately 350 feet along the north façades of the Primary Studio Complex at a beginning point 55 feet south of the north façade of the Studio Building. Height Zone E is not subject to the base height limit of 88 feet but rather limits any rooftop addition to a height limit of 84 feet. Accordingly, new construction in Height Zone E would be limited to a height of 36 feet above the existing parapet of the Studio Building within the entirety of the Height Zone E area.
- **Height Zone F—HCM Protection Zone:** Height Zone F is a rooftop zone that extends a length of approximately 350 feet along the north façades of the Primary Studio Complex and approximately 167 feet south from the north façade of the Service Building and approximately 55 feet south from the north façade of the Studio Building. Height Zone F is not subject to the base height limit of

¹⁷ Maximum height limits are defined as additional building height permitted above the 88-foot base height limit, subject to height zone area restrictions.

88 feet but prohibits the construction of any new occupiable building. Non-occupiable structures and elements, such as circulation elements, sidewalks, landscaping, security kiosks, fences, walls, projections, stairs, balconies, and appurtenances, would be permitted with no height limit. Existing rooftop appurtenances in Height Zone F may be maintained and modernized as long as screening is provided in compliance with the Specific Plan.

The height zones do not represent the actual development footprint of the Project buildings. Rather, as discussed above, new buildings would occupy only a portion of the development envelope permitted in each height zone. The height zones and associated frontage areas and building stepbacks (discussed below) would guide future development in a manner that concentrates building mass and height toward the center of the Project Site. Height Zones C and D would require an additional building stepback along the Project Site perimeter for building heights above the 88-foot base height limit.

For any new construction immediately east of the Service Building that exceeds the height of the Service Building, new construction would be set back southerly from the north façade of the Service Building by a minimum of approximately 60 feet. For any new construction immediately west of the Studio Building in Height Zone D that exceeds the height of the Service Building, new construction would be set back southerly from the north façade of the Service Building by a minimum of approximately 150 feet.

(d) Design Regulations

The Project's overall design strategy focuses on honoring the legacy of the original Pereira & Luckman master plan for Television City, rehabilitating and preserving the integrity of the HCM, creating a world-class studio facility, and enhancing the public realm. To that end, the Specific Plan sets forth design standards and specific requirements regarding maximum heights, frontage areas, building stepbacks, and other design elements, as described below.

(i) Frontage Areas and Building Stepbacks

New development within the Project Site would be subject to frontage area and building stepback requirements set forth in the Specific Plan. Frontage areas would function as buffers and transitional space around the Project Site perimeter. Within these areas, features such as sidewalks, landscaping, security kiosks, fences, walls, projections, stairs, balconies, and parking would be permitted. Building stepbacks are an architectural tool used to reduce building massing and vary building forms by pulling the façade of upper stories back from the building edge at a predetermined elevation above Project Grade. Building stepbacks would apply to those portions of buildings in Height Zones C and D that are greater than 88 feet in height above Project Grade and located adjacent to the public right-of-way or the southern property line, as described below.

- **Fairfax Avenue:** A 17-foot-wide frontage area (including a portion of the sidewalk) would be provided along the entire Project Site edge along Fairfax Avenue (total length of approximately 755 feet excluding driveways and pedestrian entrances). An additional 10-foot building setback would be provided for any building fronting Fairfax Avenue that exceeds the 88-foot base height limit within Height Zone C. As discussed further below in the context of public realm improvements, a new sidewalk, street trees, landscaping, and perimeter fencing/walls would be introduced along this frontage.
- **Beverly Boulevard:** A varying 5- to 8-foot-wide frontage area would be provided along the entire Project Site edge along Beverly Boulevard (total length of 1,219.5 feet excluding driveways and pedestrian entrances). An additional 10-foot building setback would be provided for any building fronting Beverly Boulevard that exceeds the 88-foot base height limit within Height Zone C. As discussed below, public realm improvements along this frontage would include landscaping and a gated pedestrian entrance to the Project Site providing views of the Primary Studio Complex.
- **Shared Eastern Property Line:** A 30-foot-wide frontage area would be provided along the Project Site edge adjacent to the Broadcast Center Apartments (total length of approximately 735.5 feet along the Shared Eastern Property Line).
- **The Grove Drive:** A 7-foot-wide frontage area (including a portion of the sidewalk) would be provided along the Project Site edge along The Grove Drive (total length of 404.5 feet excluding driveways and pedestrian entrances). As discussed below, public realm improvements along this frontage would include sidewalk improvements, landscaping, and additional street trees.
- **Southern Property Line/Southern Shared Access Drive:** The frontage area along the southern property line would vary from 10 feet wide along the eastern segment (adjacent to the Southern Shared Access Drive) to 30 feet wide along the central and western segments (for a total length of 1,471 feet excluding driveways and pedestrian entrances). An additional 20-foot building setback would be provided for any building that exceeds the 88-foot base height limit and is located adjacent to the southern property line within Height Zones C and D. As discussed below, public realm improvements along this frontage would include sidewalk improvements, landscaping, and additional street trees.

(ii) Other Design Regulations

The Specific Plan also would include design regulations that address the screening of rooftop equipment and outdoor storage areas, fencing, parking structures, and Project Site access points. In particular, rooftop equipment and outdoor storage areas that are visible from the public right-of-way must be screened with vegetated walls, fences, trellises, graphic treatments, other structures, or other approved measures. Fencing of up to 12 feet

in height would be permitted on-site, and chain link fencing without inserts or secondary screening (such as fabric or panels) and barbed wire fencing would be prohibited. Fencing would be maintained in a clean and well-kept manner, including through the repair of broken walls and removal of graffiti, and improved with either low maintenance landscaping, hardscape, or a combination of both.

The Specific Plan would set forth design standards regarding above-grade parking structures, including the following: requirements for vehicular entrances and exits so as to minimize interference with pedestrian and vehicular traffic on adjacent streets; a continuous enclosing wall at each floor level except at an entrance or exit driveway opening; screening of public-facing façades of parking structures with façade articulations or elements, landscaping, including vegetated walls and vertical gardens, and the use of compatible building materials; and the shielding of lighting and screening with 3.5-foot tall parapet walls for rooftop parking areas.

(e) Historic Preservation Regulations

As previously discussed, the original Primary Studio Complex includes two attached buildings—the Service Building and the Studio Building—that are designated as an HCM (CHC-2018-476-HCM).¹⁸ The Project would preserve the integrity of the existing HCM, as discussed in Project Design Features CUL-PDF-1 and CUL-PDF-2,, and any new construction within the Project Site would be required to comply with the applicable provisions of the Specific Plan, including historic preservation regulations. The Project would preserve the existing historic character-defining features of the Primary Studio Complex and restore those character-defining features which, in some cases, have been compromised in the past (prior to this Project), consistent with the HCM designation. Refer to Section IV.B, Cultural Resources, of this Draft EIR, for a list of the HCM's character-defining features.¹⁹

As described in Project Design Feature CUL-PDF-1, the Specific Plan would provide guidelines and parameters for new construction to ensure that the Project would preserve the integrity and eligibility of the HCM and its historic character-defining features. More specifically, the Specific Plan would regulate the preservation, rehabilitation, alteration, and demolition of the Primary Studio Complex and the construction of new buildings adjacent to

¹⁸ According to the HCM adoption resolution, the HCM is limited to: (1) the original 1952 Service Building; (2) the original 1952 Studio Building; (3) the enclosure of the Service Building's north façade in 1959; and (4) the addition of a small compressor room to that building's east façade, which are collectively referred to as the Primary Studio Complex. Past additions and modifications to the Primary Studio Complex after 1963 are not included as part of the HCM, as the period of significance for the HCM is 1952 to 1963.

¹⁹ See also the Historical Resources Technical Report for the TVC 2050 Project provided in Appendix C for further details and discussion of the HCM's character-defining features.

the Primary Studio Complex. As discussed in Project Design Feature CUL-PDF-2, the Project Applicant would prepare a Historic Structure Report (HSR) to further document the history of the Primary Studio Complex and guide its rehabilitation in compliance with the Secretary of the Interior's Standards for Rehabilitation (Rehabilitation Standards). The Project would comply with Section 22.171.14 of the City's Cultural Heritage Ordinance with oversight by OHR, thus ensuring compliance with the Rehabilitation Standards. Any modification to the character-defining features of the Primary Studio Complex would require written verification from a historic preservation professional that the modification complies with the Secretary of the Interior's Standards for the Treatment of Historic Properties and that consultation with OHR has occurred. Lastly, all new construction located within the Viewshed Restoration Area (i.e., the area along Beverly Boulevard beginning at Genesee Avenue and extending approximately 430 linear feet west, as defined within the HCM designation) would require review by OHR.

(f) Parking

The Specific Plan would establish parking requirements for each of the main land use categories (sound stages, production support, production office, general office, and retail uses), ranging from one to three parking spaces per 1,000 square feet of floor area, for a sitewide total of approximately 5,300 parking spaces. In the event that publicly accessible retail uses are ultimately developed on-site, separately demarcated parking areas would be provided for public use. Childcare, security stations, basecamp, and non-occupiable structures, such as sets/façades, kiosks, infrastructure-related facilities, and parking/entry facilities, would not require dedicated parking. Vehicles may be parked in tandem (double or triple) or by valet, depending on the specific parking layout. In addition, the Specific Plan would set forth a process for the approval and implementation of a reduced/shared parking plan, so long as an adequate parking supply is maintained. Additionally, parking may be located anywhere within the Project Site or off-site upon the submittal of an off-site parking agreement or covenant satisfactory to the Director of the Department of City Planning. Furthermore, temporary off-site parking due to displacement resulting from production filming and related activities may be provided, with shuttle service to the Project Site as needed. Lastly, existing uses and facilities may be maintained without changes in their respective existing parking requirements.

While the conceptual site plan provided in Figure II-4 in Section II, Project Description, of this Draft EIR illustrates specific parking locations, ultimately parking may be located anywhere throughout the Project Site, provided that the Specific Plan's requirements are met. Accordingly, parking may be provided in a combination of above-ground structures, subterranean structures, and/or surface spaces and may be designed to accommodate semi-automated or fully-automated parking operations. In addition, parking may be provided on-site incrementally to meet the needs of individual buildings and uses, as appropriate and feasible.

(g) Alcohol Sales

The Specific Plan would establish a streamlined alcohol use approval procedure subject to review by the Department of City Planning for up to 10 new establishments offering the sale of a full line of alcoholic beverages for on-site consumption, provided that certain conditions are met. In addition, the proposed Specific Plan would allow up to two new establishments for the sale of a full line of alcoholic beverages for off-site consumption (e.g., for sale at a retail store), as well as tastings, provided certain conditions are met. Based on compliance with the Specific Plan, such uses would not require any additional approval from the Department of City Planning.

(h) Childcare Facilities

The Specific Plan would allow for the siting and operation of State-licensed childcare facilities anywhere on-site. Any on-site childcare facility would be designed to provide daycare and early childhood educational services, similar to those offered at many major places of employment. It is envisioned that any childcare facility would hold flexible hours in order to accommodate extended production schedules. The hours of operation of a childcare facility located within the Specific Plan area would not be restricted by the Specific Plan. However, in no instance would a childcare facility offer any overnight lodging of children. Operation of any childcare facility would comply with the applicable State of California Code of Regulations, including without limitation all licensing requirements. Furthermore, any new childcare facility would be required to provide an on-site pick-up/drop-off queuing area. Based on compliance with the Specific Plan, such uses would not require any additional approval from the Department of City Planning.

(2) TVC 2050 Sign District

The proposed Sign District would regulate signage within the Project Site, consistent with the standards and goals of the Historic Sign Guidelines for the Primary Studio Complex.²⁰ New signage would be compatible with the historic character of the Primary Studio Complex's original sign program in terms of placement, scale, color, illumination, and material. Project signage would be integrated with and complement the overall aesthetic character of on-site development and would be designed to enhance the entertainment character of the Project Site. The Sign District would regulate, among other things, the permitted number of on-site studio-related signs, sign type, sign height, location, and the maximum area of signage permitted along the Project Site edge. As discussed below and illustrated in Figure II-10 in Section II, Project Description, of this Draft EIR, the Sign District would regulate signage within the Project Site interior and externally visible

²⁰ Architectural Resources Group, Television City Historic Sign Guidelines, June 5, 2020. Refer to Appendix C of this Draft EIR.

signage along the Project Site perimeter (such as on-site wall mounted signs that are typical at major studios) . Interior signs will be regulated based on whether the sign would be located either being below or above 88 feet. Internal signs would generally not be visible from off-site, public rights-of-way, or any publicly accessible plaza adjacent to a public right-of-way unless they are located above 88 feet. Externally visible signs located along the facades of on-site buildings will be further governed based on their vertical height from Project Grade.

Externally Visible Signs—A total of approximately 31,375 square feet of externally visible, on-site signage is proposed to be located within the Project Site. The combined signage area for all signs along Beverly Boulevard would not exceed approximately 6,100 square feet. The combined signage area for all signs along Fairfax Avenue would not exceed approximately 11,325 square feet. The combined signage area for all signs along The Grove Drive would not exceed approximately 10,350 square feet. Along the Shared Eastern Property Line near Broadcast Center Apartments, signage would be limited to smaller identification, informational, and directional signs of no more than 25 square feet each and located no more than 15 feet above Project Grade.

Project Interior Signs—The Project Site interior is defined as the interior area of the Project Site and signs would not be generally externally visible. Such signs would be located more than 100 feet from public rights-of-way (i.e., Fairfax Avenue, Beverly Boulevard and The Grove Drive) and 30 feet from the Shared Eastern Property Line. Unlimited signage would be permitted for those signs located within the Project Site interior as long as said signs are located below 88 feet. Signage located above 88 feet would be further limited to a maximum sign size of 300 square feet

A number of sign types would be prohibited throughout the Project Site, including off-site signs. Project signage may include both externally and internally lit signs, and LAMC illumination regulations would apply. Permitted sign types would include: architectural ledge signs, digital displays, illuminated architectural canopy signs, information signs, monument signs, pillar signs, pole signs, projecting signs, supergraphics, wall signs, and window signs. Prohibited sign types would include: those that contain obscene matters, as defined in Section 311 of the State Penal Code; those that contain or consist of posters, pennants, banners, ribbons, streamers, or spinners, except as permitted by the LAMC; and those that contain flashing, mechanical, or strobe lights in conflict with the provisions of LAMC Sections 80.08.4 and 93.0107.

(3) Public Realm Improvements

As discussed in Section II, Project Description, of this Draft EIR, the Project would enhance the public realm surrounding the Project Site through streetscape improvements to the pedestrian experience, while continuing to provide for the unique security needs of a

working production studio. As shown in Figure II-6 in Section II, Project Description, a minimum of approximately 28,900 square feet of open space would be provided along the Project Site boundaries. These perimeter areas would include landscaping such as trees and shrubs, lighting, wayfinding signage, and pedestrian amenities such as benches and shade structures. Along all street frontages, pedestrian access and safety would be improved, and bus stops and street lighting would be maintained. Visual screening and fencing would be provided around the entire Project Site perimeter within a softened, landscaped edge condition. A resilient, durable, and drought-tolerant selection of native and adapted tree, shrub, and groundcover species that can thrive in a developed and urbanized setting is proposed. The spacing of street trees would provide ample shade for pedestrians, and parkways would be scaled to promote long-term health and longevity. The proposed public realm improvements along each Project Site edge are described further below and are illustrated in Figure IV.H-3 through Figure IV.H-6 on pages IV.H-33 through IV.H-36.

Beverly Boulevard, which is designated as a Modified Avenue I in the Mobility Plan 2035, requires a 35-foot half-width roadway within a 50-foot half-width right-of-way. The Project would maintain the existing variable 12- to 15-foot sidewalk area, in accordance with the Mobility Plan 2035.²¹ The sidewalk would include parkways extending approximately 4 feet from the back of the curb to provide planting areas for street trees, shrubs, and groundcover. Beyond the sidewalk, a variable 5- to 8-foot-wide frontage area would extend into the Project Site and provide a transition between the sidewalk and any buildings along Beverly Boulevard. Along Beverly Boulevard near the center of the Project Site, a gate would mark the central pedestrian entrance to the Project Site and provide views of the Primary Studio Complex.

Fairfax Avenue is designated as an Avenue II, which requires a 28-foot half-width roadway within a 43-foot half-width right-of-way. The Project would provide a 12-foot public sidewalk easement in addition to the 3-foot public right-of-way to complete an overall 15-foot sidewalk area to accommodate pedestrian travel. The sidewalk would include parkways extending approximately 4 feet from the back of the curb to provide planting areas for street trees, shrubs, and groundcover. Beyond the 12-foot sidewalk, 5 feet would be provided to create a 17-foot-wide frontage area along the Project Site perimeter, thus allowing for a transition between the sidewalk and any buildings along Fairfax Avenue. Along Fairfax Avenue, landscaping, berms, and other visual screening would be introduced to conceal partially-subterranean parking and portions of the Mobility Hub.

²¹ Specifically, the sidewalk width meets the standard of 15 feet adjacent to the Project Site; however, toward Fairfax Avenue where the roadway widens up to three feet to accommodate the westbound left-turn lane to Fairfax Avenue, the sidewalk is reduced to approximately 12 feet. In consultation with the Los Angeles Bureau of Engineering, the existing configuration is considered generally compliant with the Mobility Plan 2035, and no dedication or widening is required.

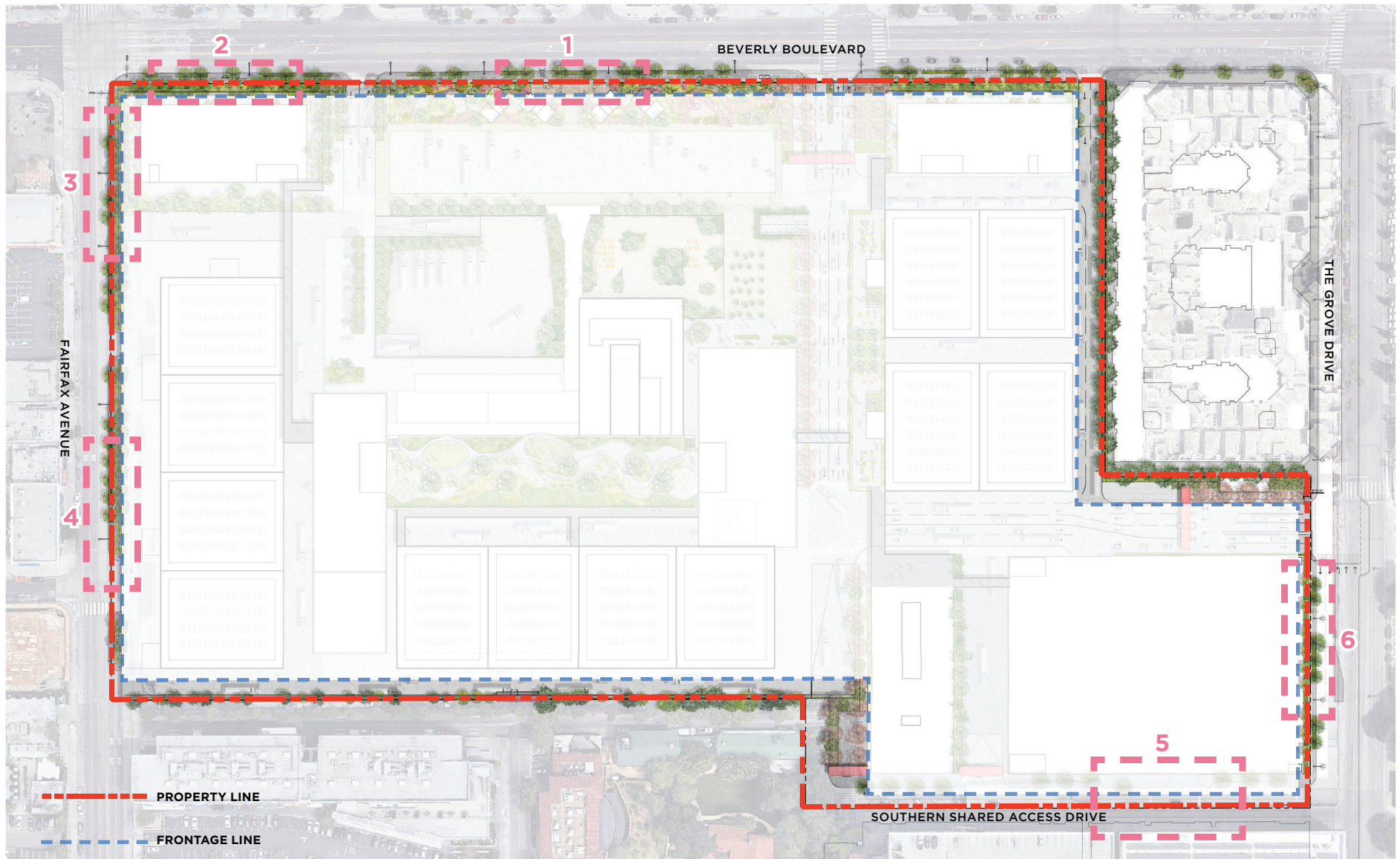
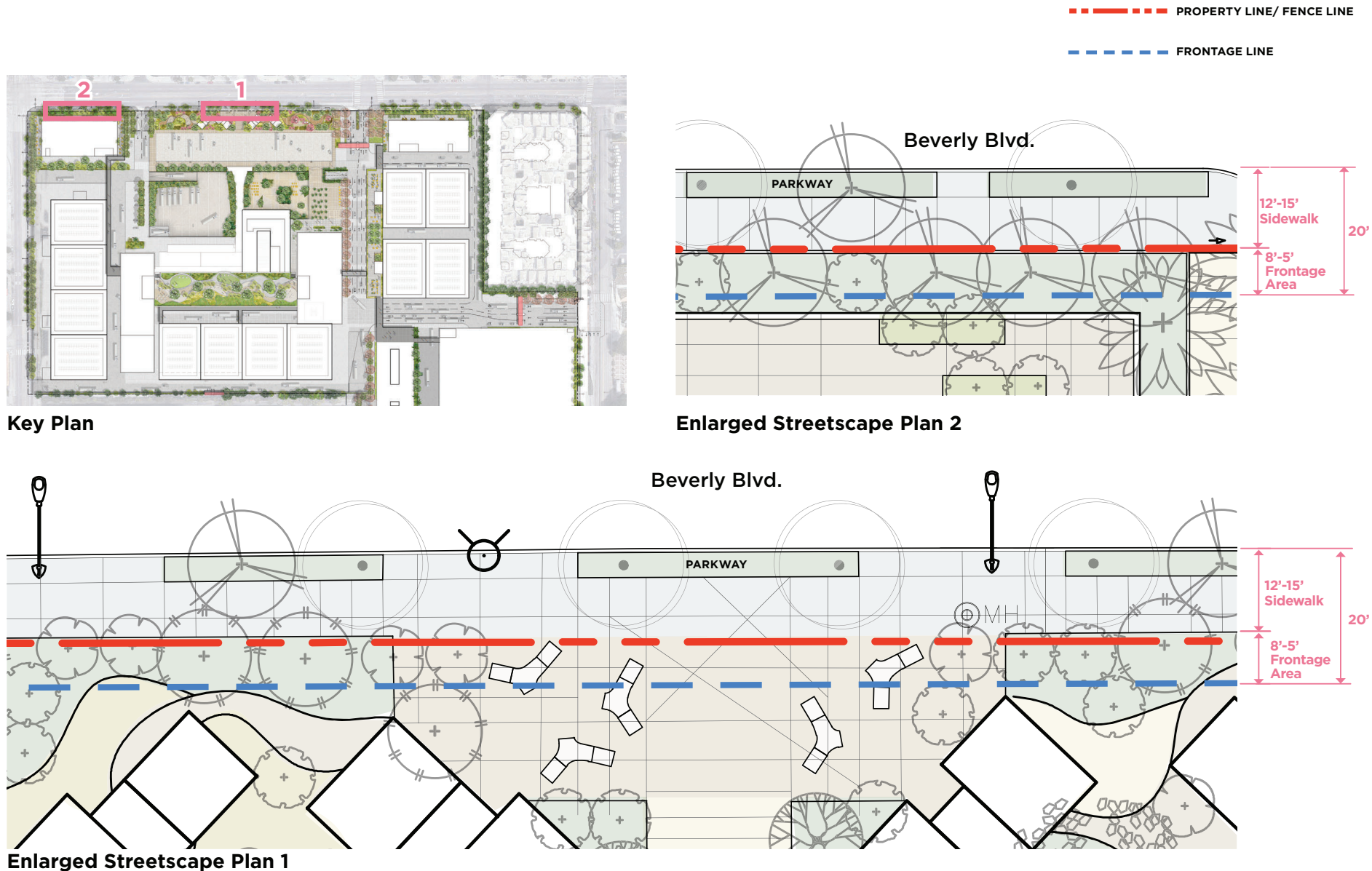


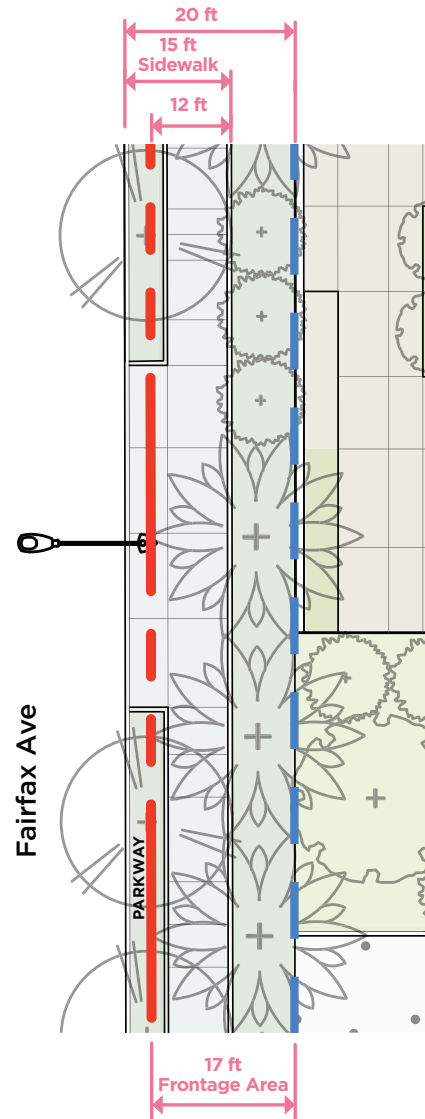
Figure IV.H-3
Public Realm Key Plan



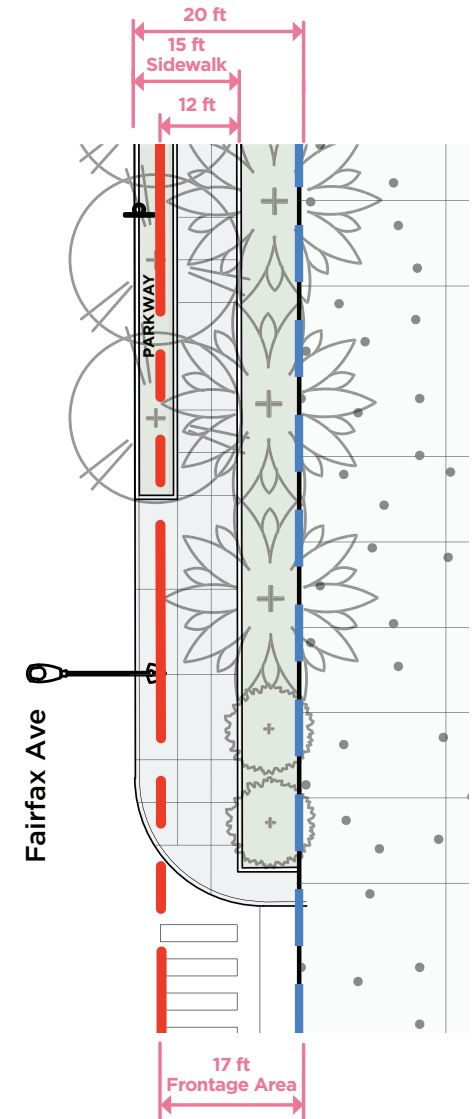


Key Plan

- - - - - **PROPERTY LINE**
 - - - - - **FRONTAGE LINE**



Enlarged Streetscape Plan 3

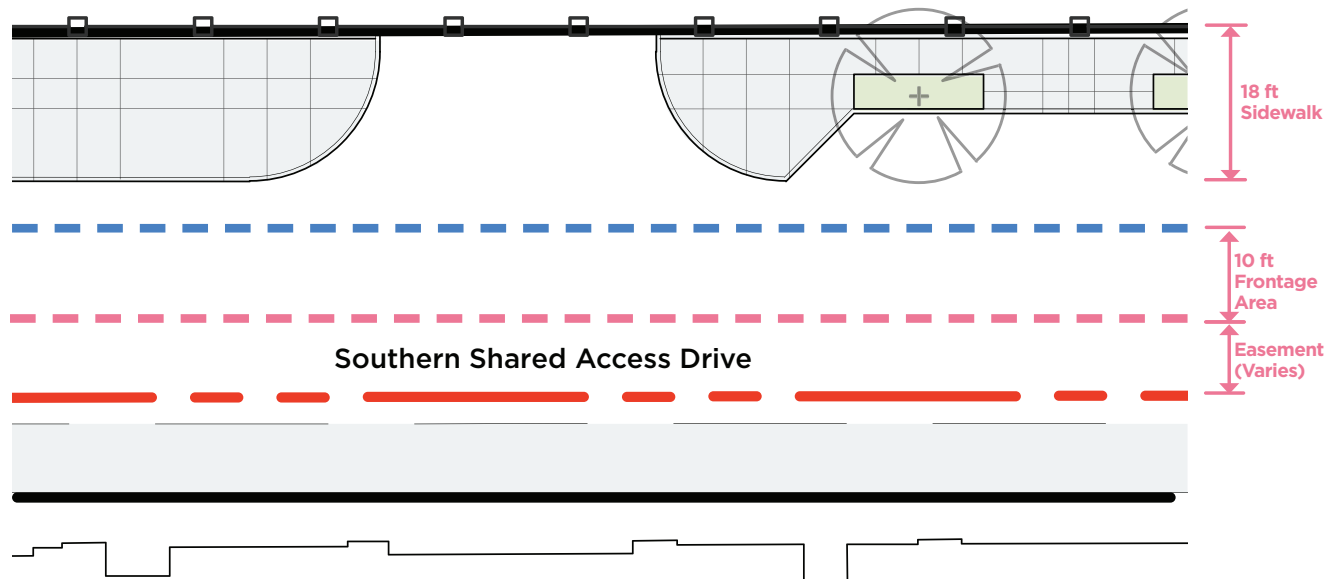


Enlarged Streetscape Plan 4

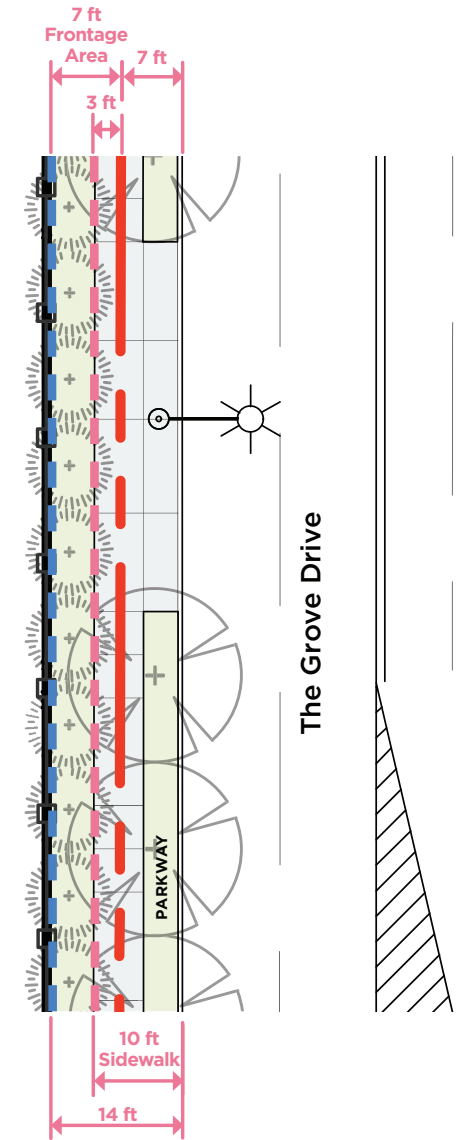
Figure IV.H-5
Fairfax Avenue Public Realm Improvements



Key Plan



Enlarged Streetscape Plan 5



Enlarged Streetscape Plan 6

Figure IV.H-6

Southern Shared Access Drive and
The Grove Drive Public Realm Improvements

The Grove Drive is designated as a Collector Street in the Mobility Plan 2035, which requires a 20-foot half-width roadway within a 33-foot half-width right-of-way. The Project would include a 3-foot-wide public sidewalk easement in addition to the 7-foot public right-of-way to provide a 10-foot sidewalk as required by the Mobility Plan 2035. The sidewalk would include parkways extending approximately 4 feet from the back of the curb to provide planting areas for street trees, shrubs, and groundcover. Adjacent to the 3-foot sidewalk easement, an additional 4 feet would be provided to create a transition between the sidewalk and the parking structure along The Grove Drive, thus creating a 7-foot frontage area along this Project Site edge. Landscaping within this frontage area and the street parkways would incorporate existing street tree and plant selections along The Grove Drive and include species to complement those at Pan Pacific Park and the Holocaust Museum LA to the east. Refer to Section IV.K, Transportation, for a discussion of the roadway widening proposed along The Grove Drive to accommodate a northbound left-turn lane to access the Project Site.

Finally, along portions of the southern property line, sidewalks, screening, and/or planting areas would be introduced. In particular, along the Southern Shared Access Drive, a 10-foot-wide sidewalk would be provided in addition to the 8-foot right-of-way where service loading areas would be located. Parkway would also be provided to allow for street tree plantings.

(4) Project Approvals

The discretionary entitlements, reviews, permits, and approvals required to implement the Project include, but are not necessarily limited to, the following:

- Annexation of the 0.63-acre portion of the Project Site located within unincorporated Los Angeles County into the City of Los Angeles, including:
 - A General Plan Amendment and Zone Change to pre-zone the County land, as required under the laws governing annexation (this action would be included in the General Plan Amendment and Zone Change described below); and
 - Related applications to the Local Agency Formation Commission.
- Pursuant to LAMC Section 11.5.6, a General Plan Amendment to: change the General Plan land use designations from Community Commercial, Limited Commercial, and Neighborhood Commercial to a unified Regional Center Commercial land use designation; assign a Regional Center Commercial land use designation to an approximately 0.63-acre portion of the Project Site located in unincorporated Los Angeles County to be annexed to the City of Los Angeles; and allow the TVC zone as a corresponding zone to the Regional Center Commercial designation.

- Pursuant to LAMC Section 12.32, a Vesting Zone Change from the existing C1.5-2D-O and C2-1-O zones to the TVC 2050 Specific Plan Zone (TVC zone), and to assign the TVC zone to an approximately 0.63-acre portion of the Project Site located in unincorporated Los Angeles County to be annexed to the City of Los Angeles.
- Pursuant to LAMC Sections 13.11, the establishment of a “SN” Sign District.
- Pursuant to LAMC Section 11.5.7, adoption of the TVC 2050 Specific Plan to provide regulatory controls and the systematic execution of the General Plan within the TVC 2050 Specific Plan geographic area.
- Pursuant to California Government Code Sections 65864 through 65869.5, a Development Agreement between the Developer and the City of Los Angeles for a term of 20 years.
- Pursuant to LAMC Section 17.15, a Vesting Tentative Tract Map to permit the merger and resubdivision of land and a haul route for the import/export of greater than 1,000 cubic yards of earth materials.
- Other discretionary and ministerial permits that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

d. Analysis of Project Impacts

Threshold (a): Would the Project physically divide an established community?

(1) Impact Analysis

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study for the Project, which is included as Appendix A of this Draft EIR, the Project would not divide an established community. As previously discussed, the Project Site is currently developed with studio and studio-related uses and is located in an urbanized area that is developed with a diverse mix of land uses. The major arterials in the Project vicinity, including Beverly Boulevard, 3rd Street, and Fairfax Avenue, are lined with commercial, institutional, and some residential uses, with residential neighborhoods interspersed between the major arterials. The organization of such developed uses is defined by the existing street grid, with residential uses concentrated along side streets.

Under the Specific Plan, portions of the Project Site would be redeveloped with new studio-related uses, including associated circulation improvements, parking facilities, landscaping, and open space. These uses would be consistent with the existing uses on-site as well as the other commercial developments located adjacent to and in the general vicinity of the Project Site. All proposed development would occur within the

boundaries of the Project Site. **Therefore, as determined in the Initial Study, the Project would not physically divide an established community. As such, impacts with respect to Threshold (a) would be less than significant. No further analysis is required.**

Threshold (b): Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

(1) Impact Analysis

(a) Local Plans and Applicable Policies

As discussed above, various local plans and regulatory documents would guide the development of the Project Site. The following discussion addresses the Project's consistency with the requirements and policies of the General Plan Framework Element, Conservation Element, Mobility Plan 2035, Wilshire Community Plan, LAMC, and the Citywide Design Guidelines that were specifically adopted for the purpose of avoiding or mitigating an environmental effect.

(i) Los Angeles General Plan

(1) Los Angeles General Plan Framework Element

The Project's general consistency with the applicable goals, objectives, and policies set forth in the General Plan Framework adopted for the purpose of avoiding or mitigating an environmental effect is discussed in detail in Table 1 of Appendix I of this Draft EIR. Provided below is a general discussion of Project consistency with applicable General Plan goals, objectives, and policies adopted for the purpose of avoiding or mitigating an environmental effect.

(a) Land Use Chapter

The Project would not conflict with the applicable objectives and policies of the General Plan Framework's Land Use Chapter that were adopted for the purpose of avoiding or mitigating an environmental effect. In particular, the Project would support Objective 3.2 to provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution, as well as Policy 3.2.3 to provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations. As detailed in Section II, Project Description, of this Draft EIR, the Project would provide a Mobility Hub on-site to support first/last mile connections; encourage employee and visitor use of public transit, carpooling, vanpooling, and biking/scooter to work; and to support other

transportation demand management (TDM) strategies. The Mobility Hub would provide an off-street space for Television City employees and visitors to access passenger pick-up/drop-off zones, carpools, vanpools, shuttles, ride-share, taxis, and other commercial and non-commercial vehicles, and the temporary parking of buses. The Mobility Hub would include space to accommodate support uses, storage, maintenance, staging facilities, bike share, and ridership amenities. Such amenities would include interactive kiosks, which would provide real-time transit data and manage access to shared vehicles; charging docks; and self-repair bike stations. Additional services to be provided at the Mobility Hub, such as employee shuttles and a rideshare program, are detailed in the TDM Program set forth in Section IV.K, Transportation, of this Draft EIR. As such, the Project's Mobility Hub would facilitate the use of public transit and support opportunities for walking and biking, thus promoting an improved quality of life.

(b) Open Space and Conservation Chapter

The Project would support the goals and policies of the Open Space and Conservation Chapter by providing common open space that would be publicly accessible. A minimum of approximately 28,900 square feet of open space would be located along the Project Site boundaries. These perimeter areas would include landscaping such as street trees and shrubs, lighting, wayfinding signage, and pedestrian amenities such as benches and shade structures. Along all street edges, pedestrian access and safety would be improved, and bus stops and street lighting would be maintained. Visual screening and fencing would be provided around the entire Project Site perimeter within a softened, landscaped edge condition. As described above and illustrated in Figure IV.H-3 through Figure IV.H-6 on pages IV.H-33 through IV.H-36, respectively, new sidewalks with planted parkways and landscaped frontage areas would be provided along Beverly Boulevard, Fairfax Avenue, The Grove Drive, and the southern property line to meet the City's sidewalk requirements, provide transitions between sidewalks and building edges, further separate pedestrians from vehicle traffic, and screen certain Project components such as parking areas. Together, these perimeter elements would improve the pedestrian experience, while continuing to provide for the unique security needs of a working production studio.

(c) Economic Development Chapter

The Project would support Objective 7.2 of the Economic Development Chapter to establish a balance of land uses that provide for commercial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality through the development of a mix of integrated and supporting land uses within a single site. Specifically, the Project represents the continuation of an existing studio use and would involve the modernization and expansion of Television City to meet the contemporary needs and changing demands of the entertainment industry, while rehabilitating and preserving the integrity and eligibility of the HCM on-site. In addition, by

providing a Mobility Hub on-site, the Project would facilitate a reduction in vehicle trips and vehicle miles traveled. This, along with the incorporation of Project Design Features provided in Section IV.A, Air Quality, and Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, would facilitate a reduction in air pollution to improve environmental quality. Therefore, the Project would not conflict with the General Plan Framework chapter.

(d) Transportation Chapter/Mobility Plan 2035

The Project would not conflict with the relevant policies of the Mobility Plan 2035. In particular, the Project would support Policy 1.6 to provide for the safe passage of all modes of travel during construction. As identified in Section IV.K, Transportation, of this Draft EIR, a Construction Traffic Management Plan would be prepared and implemented per Project Design Feature TR-PDF-1 in order to minimize potential construction impacts to the surrounding area due to construction trucks, worker trips, and any possible sidewalk and lane closures. The Construction Traffic Management Plan would include temporary traffic controls during all construction activities adjacent to public rights-of-way on public roadways to provide for the safe passage for all modes of travel during construction. The Construction Traffic Management Plan would be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site. In addition, a work site traffic control plan identifying the location of all temporary roadway lane and/or sidewalk closures needed during Project construction would be submitted to the Los Angeles Department of Transportation (LADOT).

The Project would provide short-term and long-term bicycle parking spaces in accordance with LAMC requirements, including secured bicycle parking facilities, as well as valet service, showers, lockers, and bicycle service areas with repair stands within the Project Site. Furthermore, the Project Applicant would make a financial contribution for bicycle improvements in support of the Mobility Plan 2035's policies, as well as pedestrian facilities improvements as part of the City's Vision Zero plan, as discussed further in Section IV.K, Transportation, of this Draft EIR. Lastly, the Project would contribute to and implement traffic-calming measures as part of a Neighborhood Traffic Management Plan to address potential cut-through traffic on surrounding residential streets, as also discussed in Section IV.K, Transportation. Thus, the Project would provide safe passage for all modes of travel and would not conflict with the Mobility Plan 2035.

(e) Infrastructure and Public Services Chapter

The Project would support Policy 9.3.1 and Objective 9.6 within the General Plan Framework's Infrastructure and Public Services Chapter which are intended to reduce the total amount of flow entering the stormwater system, as well as to pursue effective and efficient approaches to protecting water quality by implementing a Stormwater Pollution Prevention Plan (SWPPP) during construction that would include best management practices (BMPs) and other erosion control measures to minimize the discharge of

pollutants into stormwater runoff, as discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR. The Project would also comply with the Standard Urban Stormwater Mitigation Plan (SUSMP) requirements to reduce the discharge of polluted runoff from the Project Site and would comply with the City's Low Impact Development (LID) Ordinance, which promotes on-site infiltration, capture and reuse, or biofiltration/biotreatment BMPs. Furthermore, as discussed in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Los Angeles Department of Water and Power's (LADWP) current and projected available water supplies for normal, single-dry, and multiple-dry years would be sufficient to meet the Project's water demand in addition to the existing and planned future water demands within LADWP's service area through the year 2045. Moreover, the Project would not exceed the available capacity of the water distribution infrastructure that would serve the Project Site. Additionally, as discussed in Section IV.M.2, Utilities and Service Systems—Wastewater, of this Draft EIR, there would be adequate conveyance and treatment capacity to serve the Project's projected demand in addition to the Department of Public Works, Bureau of Sanitation's (LASAN) existing commitments. Specifically, per the results of the WWSI prepared for the Project, LASAN has determined that the existing capacity of the sewer lines in Beverly Boulevard and Southern Shared Access Drive would have sufficient capacity to accommodate the Project's projected wastewater flows. Overall, the Project would not conflict with the applicable goals, objectives, and policies of the General Plan Framework's Infrastructure and Public Services Chapter which have been adopted for the purpose of avoiding or mitigating an environmental effect.

(2) Los Angeles General Plan Conservation Element

As outlined above, Section 5 of the Conservation Element of the General Plan establishes an objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes and a corresponding policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities.

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, the original Primary Studio Complex includes two attached buildings—the Service Building and the Studio Building—that are designated as an HCM (CHC 2018-476-HCM). All new construction within the Project Site would be required to comply with the provisions of the Specific Plan, including historic preservation regulations, as discussed in Project Design Features CUL-PDF-1 and CUL-PDF-2, as applicable. In addition, the Project proposes to preserve all of the existing historic character-defining features of the Primary Studio Complex and restore those character-defining features which, in some cases, have been compromised in the past (prior to this Project), consistent with the HCM designation. As previously discussed, the Specific Plan would regulate the preservation, rehabilitation, alteration, and demolition of the HCM and the construction of new buildings adjacent to the

HCM. The Specific Plan would require a historic preservation professional's written verification of compliance with the applicable provisions of the Specific Plan and the HCM designation and consultation with OHR. Additionally, the rehabilitation of the Primary Studio Complex will comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties. Ultimately, compliance with the Specific Plan's historic preservation regulations would allow for the rehabilitation and preservation of the integrity of the Primary Studio Complex, consistent with the HCM designation.

Furthermore, the Project would comply with the City of Los Angeles Administrative Code Section 22.171.14 (i.e., the Cultural Heritage Ordinance), and OHR would review all Project construction documents prior to approving building permits to ensure compliance with the Rehabilitation Standards. As such, the Project would protect an important historical resource, consistent with the goals, objectives, and policies of the Conservation Element.

(3) Wilshire Community Plan

The Project's consistency with the applicable goals, objectives, and policies set forth in the Wilshire Community Plan is discussed in detail in Table 2 of Appendix I of this Draft EIR. As discussed therein, the Project would be consistent with the objectives and policies that support the goals of the Wilshire Community Plan. Specifically, the Project would not conflict with Goal 2 to encourage strong and competitive commercial sectors which promote economic vitality and serve the needs of the Wilshire community through well-designed, safe and accessible areas, while preserving historic and cultural character. The Project would involve the modernization and expansion of Television City to meet the contemporary needs and changing demands of the entertainment industry, while rehabilitating and preserving the integrity and eligibility of the HCM. As discussed above, all new construction within the Project Site would be required to comply with the provisions of the Specific Plan, including historic preservation regulations, as applicable. The Project proposes to preserve all of the existing historic character-defining features of the Primary Studio Complex and restore those character-defining features which, in some cases, have been compromised in the past (prior to this Project), consistent with the HCM designation.

The Project would also support Objective 5-1 to preserve existing open space resources and, where possible, develop new open space. The Project would provide a minimum of approximately 28,900 square feet of common open space along the Project Site boundaries. These perimeter areas would include landscaping such as street trees and shrubs, lighting, wayfinding signage, and pedestrian amenities. As described above, the proposed landscape and sidewalk improvements around the Project Site perimeter would improve pedestrian safety and comfort; incorporate visual screening and fencing within a softened, beautified edge condition; incorporate berms to conceal partially-subterranean parking areas; contribute to improved street identities; and highlight the main

studio entrance on Beverly Boulevard. Additionally, along The Grove Drive, the improvements would complement planting selections at Pan Pacific Park and the Holocaust Museum LA to the east. Sidewalks, screening, and/or planting areas would also be introduced along portions of the southern property line.

The Project would also support Objective 8-1 to provide adequate police facilities, personnel and protection to correspond with existing and future population and service demands. Through Project Design Features POL-PDF-1 through POL-PDF-6, the Project would include numerous operational design features to enhance safety within and immediately surrounding the Project Site and therefore reduce the demand for police services. Additionally, the Project would support Objective 10-2 to increase the use of public transit and Policy 12-1.1 to encourage non-residential developments to provide employee incentives for using non-vehicle transportation alternatives (including carpools, vanpools, buses, shuttles, subways, bicycles, and walking) by providing a TDM Program. As detailed in Section IV.K, Transportation, of this Draft EIR, the TDM Program would include an educational program/on-site coordinator, bicycle parking and amenities, pedestrian amenities, shuttle service to the planned Metro D (Purple) Line Wilshire/Fairfax station, a ride-share matching and carpool/vanpool program, first-mile/last-mile options, a Guaranteed Ride Home Program, and a Mobility Hub with a transportation information center/kiosks. The Mobility Hub would be located on-site to support first/last mile connections, encourage employee and visitor use of public transit, and support other TDM strategies. The Mobility Hub would provide an off-street space for Television City employees and visitors to access passenger pick-up/drop-off zones and the temporary parking of buses. Additionally, the Mobility Hub would include space to accommodate support uses, storage, maintenance, staging facilities, bike share, and ridership amenities. As such, the Project would support public transit and other alternative modes of transportation.

With regard to land use designations, as discussed above, the Community Plan's designations for the Project Site are Community Commercial, Neighborhood Commercial, and Limited Commercial, as detailed in Table IV.H-1 on page IV.H-9. Pursuant to LAMC Section 11.5.6, the Project would include a General Plan Amendment to: change the General Plan land use designations to a unified Regional Center Commercial land use designation; assign a Regional Center Commercial land use designation to the approximately 0.63-acre portion of the Project Site located in unincorporated Los Angeles County to be annexed to the City; and allow the TVC zone as a corresponding zone to the Regional Center Commercial designation. Thus, the new Regional Center Commercial land use designation would serve to create a cohesive Project Site subject to uniform land use regulations, while recognizing the unique land uses that have been operating on-site for many decades. In conjunction with the associated TVC zone, discussed below, the requested General Plan Amendment would allow for the orderly and cohesive development of the Project Site.

(ii) Los Angeles Municipal Code

As previously discussed, the Project Site is zoned C2-1-O (Commercial, Height District 1, Oil Drilling Overlay) and C1.5-2D-O (Limited Commercial, Height District 2 subject to a Development Limitation, Oil Drilling Overlay). The unincorporated County parcel is zoned C-MJ (Major Commercial). Although the C2 zone permits a wide array of land uses, including broadcasting studios, offices, and retail uses, the LAMC does not have a zoning designation that can appropriately address the unique characteristics of a major studio/entertainment site, except in certain approved specific plan areas. Accordingly, the Project includes the proposed Specific Plan to regulate the modernization and expansion of media production facilities within Television City. As described above, the Specific Plan would establish development guidelines and standards to regulate basic planning, design, and development concepts for future development on-site. As such, the proposed Specific Plan would create a regulatory framework that accounts for the special needs of the Project Site and provides flexibility to address potential future changes in technology and space requirements inherent to the rapid pace of entertainment technology's advancement. The primary development regulations set forth in the Specific Plan would address land use, design (including building heights, frontage areas, building stepbacks, fencing, parking structure design, etc.), historic preservation, childcare, alcohol sales, and parking requirements, as well as associated implementation procedures.

Pursuant to LAMC Section 12.32, the Project Applicant is requesting a Vesting Zone Change from the existing C1.5-2D-O and C2-1-O zones to the TVC 2050 Specific Plan Zone, including for the 0.63-acre portion of the Project Site located within unincorporated Los Angeles County which would be annexed into the City, thus creating a cohesive Project Site subject to uniform land use regulations. The proposed TVC zoning designation would set forth regulatory controls for the orderly and cohesive development of the Project Site, comparable to existing zoning requirements, while recognizing the unique land uses that have been operating on-site for many decades. With the approval of the TVC 2050 Specific Plan and the associated TVC zone, the Project would not conflict with the LAMC.

(iii) Citywide Design Guidelines

The Citywide Design Guidelines are intended to be performance goals and not zoning regulations or development standards. Although each of the Citywide Design Guidelines should be considered in a project, not all objectives will be appropriate in every case. The Project is determined to be consistent with the Citywide Design Guidelines, as discussed below.

Guideline 1: Promote a Safe, Comfortable and Accessible Pedestrian Experience for All.

The Project would provide dedicated pedestrian entries to the Project Site along the Project Site perimeter along Beverly Boulevard, Fairfax Avenue, The Grove Drive, and the southern property line. All of the access points would be controlled with gates and/or staffed guard houses. A gate marking the central pedestrian entrance to the studio would be located along Beverly Boulevard. In addition to the Mobility Hub, ride-share pick-up/drop-off zones could be located at Beverly Boulevard, Fairfax Avenue and/or at the Southern Shared Access Drive.

Internal circulation routes, including drives, sidewalks, and pathways, would be introduced throughout the Project Site to facilitate efficient access to all buildings and parking areas from the numerous Project driveways. Additionally, the Mobility Hub located on-site would support first/last mile connections. The Mobility Hub would provide an off-street space for Television City employees and visitors to access passenger pick-up/drop-off zones and would include space to accommodate support uses, storage, and amenities. Such amenities may include interactive kiosks, which would provide real time transit data and manage access to shared vehicles; charging docks; and self-repair bike stations.

Furthermore, the Project would include several improvements that prioritize the pedestrian experience, including landscaping, sidewalk and crosswalk improvements and bus stop improvements around the Project Site. Therefore, the Project would not conflict with this objective of the Citywide Design Guidelines.

Guideline 2: Carefully Incorporate Vehicular Access Such That it Does Not Degrade the Pedestrian Experience.

The Project would incorporate a multi-level circulation plan that provides flexible and efficient access from all Project Site edges along existing roadways and efficient circulation to meet the demands of a large-scale production studio. Two primary production levels would provide access, staging, storage, and connectivity between active production and supporting uses. The main level (at Project Grade), or the production activity level, would provide direct and separate access for vehicles and pedestrians to the uses on-site via a unified ground plane encircling the production facilities. The lower level, or the production operations level, would provide large areas of flexible space to house production vehicles and store equipment, with direct access to the production activity level above via vehicle ramps, pedestrian stairs and elevators, and service elevators. To facilitate efficient, safe, and effective production circulation, both the production activity and the production operations levels would provide space for basecamp, production staging, loading, and emergency vehicle access throughout the Project Site. These levels would be interconnected via a series of vehicular and pedestrian ramps, stairs, and elevators.

As shown in Figure II-7 in Section II, Project Description, of this Draft EIR, vehicular access would be provided via nine vehicular access points as follows:

- Three driveways along Beverly Boulevard, including one entry/exit driveway and two right-in/right-out driveways;
- Three driveways along Fairfax Avenue, including one entry/exit driveway and two right-in/right-out driveways;
- One entry/exit driveway on The Grove Drive; and
- Two entry/exit driveways along the Southern Shared Access Drive, accessed from The Grove Drive.

As discussed above, internal circulation routes would be introduced throughout the Project Site to facilitate efficient access to all buildings and parking areas from the various Project site driveways. On-site parking for production vehicles would be provided adjacent to the proposed sound stages and in other large areas to accommodate basecamp activities. Additionally, the Mobility Hub would provide an off-street space for Television City employees and visitors to access passenger pick-up/drop-off zones, carpools, vanpools, shuttles, ride-share, taxis, and other commercial and non-commercial vehicles, and the temporary parking of buses.

As previously discussed, vehicles may be parked in tandem (double or triple) or by valet, depending on the specific parking layout. In addition, while the conceptual site plan illustrates specific parking locations, ultimately parking may be located throughout the Project Site, provided that the Specific Plan's requirements are met. Accordingly, parking may be provided in a combination of above-ground structures, subterranean structures, and/or surface spaces and may be designed to accommodate semi-automated or fully automated parking operations.

Pedestrian access to the Project Site is illustrated in Figure II-8 in Section II, Project Description, of this Draft EIR. As shown in Figure II-8, pedestrian access would be provided from Beverly Boulevard, Fairfax Avenue, The Grove Drive, and the southern property line. All access points would be controlled with gates and/or staffed guard houses. A gate marking the main pedestrian entrance to the Project Site would be located along Beverly Boulevard near the center of the Project Site. Internal paths would be utilized throughout the Project Site to facilitate efficient circulation and access to all buildings and parking areas from the various Project driveways, and pedestrian bridges may be used to connect production areas within the buildings. Additionally, ride-share pick-up/drop-off zones could be located along Beverly Boulevard, Fairfax Avenue, and/or the Southern Shared Access Drive, as well as in the Mobility Hub. As previously discussed, sidewalks would be widened in certain locations along the Project Site

perimeter to allow for greater separation between pedestrians and vehicles, and streetscaping and other amenities would be incorporated to enhance the pedestrian experience.

Therefore, the Project would not conflict with this objective of the Citywide Design Guidelines.

Guideline 3: Design Projects to Actively Engage With Streets and Public Space and Maintain Human Scale.

Although a gated and controlled perimeter would remain in place at the Project Site to provide for the unique security needs of a working production studio, the Project would nevertheless enhance the public realm through streetscape improvements to the pedestrian experience. A minimum of approximately 28,900 square feet of open space would be located along the Project Site boundaries. These perimeter areas would include street trees and shrubs, lighting, wayfinding signage, and pedestrian amenities such as benches and shade structures. Along all street edges, pedestrian access and safety would be improved, and bus stops and street lighting would be maintained. Visual screening and fencing would be provided around the entire Project Site perimeter within a softened, landscaped edge condition.

The existing sidewalks surrounding the Project Site do not in all cases meet the current Mobility Plan 2035 standards. Along the Project Site frontages, a variable 12- to 15-foot-wide sidewalk is provided along Beverly Boulevard, a 10-foot-wide sidewalk with parkways is provided along Fairfax Avenue, and a 9-foot-wide sidewalk is provided along The Grove Drive. The existing sidewalks along Fairfax Avenue and The Grove Drive do not meet current City standards, and the areas accessible to pedestrians are as narrow as 3 to 4 feet in some places. As described above and illustrated in Figure IV.H-3 through Figure IV.H-6 on pages IV.H-33 through IV.H-36, respectively, new sidewalks with planted parkways and landscaped frontage areas would be provided along Beverly Boulevard, Fairfax Avenue, The Grove Drive, and the Southern Shared Access Drive to meet the City's sidewalk requirements, provide transitions between sidewalks and building edges, further separate pedestrians from vehicle traffic, and screen certain Project components such as parking areas. In particular, along Fairfax Avenue, the Project would provide a 12-foot public sidewalk easement in addition to the 3-foot public right-of-way to complete an overall 15-foot sidewalk area to accommodate pedestrian travel, consistent with City standards. Additionally, the Project would include a 3-foot-wide public sidewalk easement along The Grove Drive in addition to the 7-foot public right-of-way to provide the required 10-foot sidewalk. Finally, along portions of the southern property line, sidewalks, screening, and/or planting areas would be introduced. In particular, along the Southern Shared Access Drive, a 10-foot-wide sidewalk would be provided in addition to the 8-foot

right-of-way where service loading areas would be located, for a total 18-foot-wide sidewalk in some areas. Parkways also would be provided to allow for street tree plantings.

Therefore, the Project would not conflict with this objective of the Citywide Design Guidelines.

Guideline 4: Organize and Shape Projects to Recognize and Respect Surrounding Context.

The Project incorporates site planning and architectural strategies to complement the scale and character of the surrounding neighborhood. As previously discussed, the Specific Plan would include height zones with specified maximum height limits to regulate building heights throughout the Project Site, with taller maximum heights concentrated in the center of the Project Site, away from Project Site edges and adjacent uses. In particular, Height Zone A (the Viewshed Restoration Area) would extend a length of 430 feet along Beverly Boulevard in the central/northern portion of the Project Site and limit building heights to approximately 58 feet or two-thirds the height of the existing HCM (88 feet in height), consistent with the HCM designation (CHC 2018-476-HCM). Height Zone B in the southeast portion of the Project Site and Height Zone C in the western, northwest, and northeast portions of the Project Site would limit building height to 130 feet and 160 feet, respectively. The tallest buildings on-site would be located in Height Zone D, in the central/rear portion of the Project Site, with a maximum height of 225 feet. Building heights above the Primary Studio Complex would be further limited, with heights limited to 36 feet above the existing parapet of the Studio Building in Height Zone E (approximately 84 feet above Project Grade) and no new occupiable buildings in Height Zone F.

Additionally, new development within the Project Site would be subject to frontage area and building setback requirements, as set forth in the Specific Plan and described above. Frontage areas would function as buffers and transitional space around the Project Site perimeter. Building setbacks are an architectural tool used to reduce building massing and vary building forms by pulling the façade of upper stories back from the building edge at a predetermined elevation above Project Grade. Building setbacks would apply to those portions of buildings in Height Zones C and D greater than 88 feet in height above Project Grade. Collectively, these building restrictions and design elements would allow Project development to remain sensitive to both the HCM on-site and surrounding uses. Therefore, the Project would not conflict with this objective of the Citywide Design Guidelines.

Guideline 5: Express a clear and coherent architectural idea.

The Project's overall design strategy focuses on honoring the legacy of the original Pereira & Luckman master plan for Television City, rehabilitating and preserving the

integrity of the HCM, creating a world-class studio facility, and enhancing the public realm. To that end, the Specific Plan sets forth design standards and specific requirements regarding building heights, frontage areas, building stepbacks, and other design elements. While the Specific Plan would not place limitations on architectural styles, all new construction adjacent to the HCM would be consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties, thus ensuring general architectural compatibility with the existing International style such that the historic integrity of the HCM would be preserved.

As previously described, with the exception of the HCM Protection Zone (Height Zone F) where no new occupiable structures could be constructed, the maximum height limits of the proposed height zones would vary from 58 feet to 225 feet, with a base height limit of 88 feet in Height Zones C and D, consistent with the height of the HCM. Frontage areas varying in depth between 5 feet and 30 feet would also be provided on all edges of the Project Site and would function as buffers and transitional space around the Project Site perimeter. Within these areas, features such as sidewalks, landscaping, security kiosks, fences, walls, projections, stairs, balconies, and parking would be permitted. Additionally, building stepbacks varying between 10 feet and 20 feet would be provided along Fairfax Avenue, Beverly Boulevard, and the southern property line/Southern Shared Access Drive to reduce building massing and vary building forms by pulling the façade of upper stories back from the building edge at a predetermined elevation. Building stepbacks would apply to those portions of buildings in Height Zones C and D greater than 88 feet in height above Project Grade.

As discussed in Project Design Feature CUL-PDF-1, Project Parameters would be in place that set forth the maximum permitted development footprint and heights for new construction adjacent to the Primary Studio Complex. Overall, the bulk and mass of new buildings immediately east and west of the Primary Studio Complex would be concentrated towards the south, away from the primary (north) façade, thereby ensuring that the Primary Studio Complex retains its visual prominence. Ultimately, construction of new buildings immediately east and west of the Primary Studio Complex would not affect any historic materials or features that characterize the Primary Studio Complex. After Project buildout, the distinctive form and design of the Primary Studio Complex would remain intact and its architectural features would remain visible. Furthermore, as discussed above, the proposed Sign District would be consistent with the standards and goals of the Historic Sign Guidelines for the Primary Studio Complex. As previously discussed, the Project would preserve all of the existing historic character-defining features of the Primary Studio Complex and restore those character-defining features which, in some cases, have been compromised in the past (prior to this Project), consistent with the HCM designation. Overall, the Project design would express a clear and coherent architectural idea that respects the design, character, and spatial relationships of the existing HCM.

Guideline 6: Provide Amenities That Support Community Building and Provide an Inviting, Comfortable User Experience.

The Project has been designed to restore views of the HCM (which are currently obstructed), enhance the public realm, create more effective transitions between off-site and on-site uses, and provide useful screening and buffering of sensitive uses. Landscaping and open space elements would be used to unify the various building types, programs, and activities on the Project Site through a cohesive plant palette. Planting zones and associated palettes would be established to define streetscape areas, gateways and major Project Site entrances, production areas, bungalows, and rooftop terraces. Plantings would include resilient, drought-tolerant native and adaptive tree, shrub, and groundcover species, including shade trees.

Additionally, as previously discussed, the Project would enhance the public realm through streetscape improvements to the pedestrian experience, while continuing to provide for the unique security needs of a working production studio. Perimeter areas would include landscaping such as street trees and shrubs, lighting, wayfinding signage, and pedestrian amenities. Along all street edges, pedestrian access and safety would be improved, and bus stops and street lighting would be maintained. Visual screening and fencing would be provided around the entire Project Site perimeter within a softened, landscaped edge condition. As described above and illustrated in Figure IV.H-3 through Figure IV.H-6 on pages IV.H-33 through IV.H-36, respectively, new sidewalks with planted parkways and landscaped frontage areas would be provided along Beverly Boulevard, Fairfax Avenue, The Grove Drive, and the Southern Shared Access Drive to meet the City's sidewalk requirements, provide transitions between sidewalks and building edges, further separate pedestrians from vehicle traffic, and screen certain Project components such as parking areas. Together, these perimeter elements would improve the pedestrian experience, while continuing to provide for the unique security needs of a working production studio. Accordingly, the Project would not conflict with this objective of the Citywide Design Guidelines.

Guideline 7: Carefully arrange design elements and uses to protect site users.

As previously described, the Project would create a pedestrian-oriented public realm along Beverly Boulevard, Fairfax Avenue, The Grove Drive and the southern property line/Southern Shared Access Drive and incorporate new landscaping along all public frontages. Sidewalks around the Project Site perimeter would be expanded in certain areas and upgraded with new landscaped parkways and frontage areas, to meet the City's sidewalk requirements, provide transitions between sidewalks and building edges, further separate pedestrians from vehicle traffic, and screen certain Project components such as parking areas. The Project would also include the signalization of the currently unsignalized crosswalk across Fairfax Avenue at 1st Street. Bus stops would be upgraded along Fairfax Avenue and Beverly Boulevard to include adequate benches, shelters,

lighting, LED displays, and signage to the extent feasible under the City of Los Angeles' current bus shelter contract. The Project Applicant would also contribute toward pedestrian facility improvements as part of Vision Zero, including a pedestrian hybrid beacon at Stanley Avenue and Melrose Avenue, as discussed further in Section IV.K, Transportation, of this Draft EIR. Project lighting would be introduced at building entrances and walkways to facilitate pedestrian orientation and clearly identify and secure pedestrian routes between parking areas and building points of entry. Light sources would be shielded and/or directed toward Project Site areas to minimize light spill-over to neighboring properties and the surrounding area while utilizing low-level exterior lights at the Project Site perimeter, as needed, for aesthetic, security, and wayfinding purposes. Additionally, the Project Applicant would contribute to and implement traffic-calming measures as part of a Neighborhood Traffic Management Plan to address potential cut-through traffic, as also discussed in Section IV.K, Transportation, of this Draft EIR.

Any new driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding access and would incorporate pedestrian warning systems, as appropriate. Ride-share pick-up/drop-off zones could be located at Beverly Boulevard, Fairfax Avenue and/or at the Southern Shared Access Drive, as well as in the Mobility Hub. Pedestrian access would be provided along all street and alley frontages, and all access points would be controlled with gates and/or staffed guard houses. With regard to on-site circulation, as discussed in Section II, Project Description, of this Draft EIR, the Project would incorporate a multi-level circulation plan to facilitate adequate, safe, and efficient ingress/egress, circulation, staging, and parking that meets the demands of a large-scale production studio. This multi-level circulation plan would include a main level, or production activity level, providing direct and separate access to the sound stages for vehicles and pedestrians, and a lower level, or production operations level, to house stage production vehicles and store equipment. In connection with the multi-level circulation plan, driveways would provide access to these levels at different elevations across the Project Site. Driveways in the northerly portion of the Project Site would provide access to the production activity level, while driveways in the southerly portion of the Project Site would provide access to the production operations level. Internal roadways and ramps would allow vehicles to circulate the entirety of the Project Site and use the most convenient driveway along any frontage, thereby reducing vehicle circulation along the adjacent roadways and allowing vehicles to efficiently service production activities.

Additionally, the proposed Mobility Hub would provide an off-street space for Television City employees and visitors to access passenger pick-up/drop-off zones, carpools, vanpools, shuttles, ride-share, taxis, and other commercial and non-commercial vehicles, and the temporary parking of buses on the Project Site. Furthermore, Fairfax Avenue, Beverly Boulevard, and West 3rd Street have been identified in the High Injury Network under the City's Vision Zero plan. The City's Vision Zero plan promotes projects that are designed to increase safety on these City streets, and improvements such as the

installation of a new rectangular rapid flash beacon at Fuller Avenue and Beverly Boulevard and left-turn phasing at the signalized intersection of Martel Avenue/Hauser Boulevard and 3rd Street. The Project would contribute to signal improvements at other nearby intersections as part of its traffic improvement program, including left-turn signalization at the following three key intersections in coordination with LADOT: Fairfax Avenue and 3rd Street, Martel Avenue/Hauser Boulevard and 3rd Street, and La Brea Avenue and 3rd Street. The Project's proposed pedestrian and vehicular improvements would prioritize safety and access for all individuals.

Guideline 8: Protect the site's natural resources and features.

The Project Site is located in a densely developed, urbanized area. Under existing conditions, the Project Site has limited landscaping, primarily located around the perimeter, while much of the interior of the Project Site is dominated by large surface parking areas. Currently, portions of the Project Site perimeter are lined with trees, shrubs, bougainvillea and climbing vines, segments of which include green screening. Existing landscaping within the Project Site interior includes limited trees, succulents and shrubs, and some of the parking areas include landscaped infiltration basins. Street trees are also located along the Beverly Boulevard and Fairfax Avenue edges. As discussed in the Tree Inventory Report included as Appendix A of the Initial Study, a total of 181 trees and palms were inventoried on and surrounding the Project Site.^{22,23} None of the surveyed trees are considered protected species by the City of Los Angeles Protected Tree Ordinance No. 177,404 (LAMC Chapter IV, Article 6) and Ordinance No. 186,873.

As previously discussed, the Project would introduce landscaping and open space elements to unify the various building types, programs, and activities on the Project Site through a cohesive plant palette. Planting zones and associated palettes would be established to define streetscape areas, gateways and major Project Site entrances, production areas, bungalows, and rooftop terraces. Plantings would include resilient, drought-tolerant native and adaptive tree, shrub, and groundcover species, including shade trees. As indicated in the Tree Inventory Report, all of the existing on-site trees and three street trees would be removed as part of the Project, all of which would be replaced in accordance with applicable City requirements. All other trees would be avoided or preserved in place. Thus, the Project would protect the Project Site's natural resources and features to the extent practical.

²² Palms often are not considered trees because they lack a vascular cambium, which causes tree trunk diameters to expand over time; thus, they are listed separately herein. Palms are not specifically addressed in City requirements.

²³ Carlberg Associates, Tree Inventory Report—Television City Specific Plan Project, April 21, 2021.

Guideline 9: Configure the site layout, building massing and orientation to lower energy demand and increase the comfort and well-being of users.

As discussed in Section II, Project Description, of this Draft EIR, the Project would support environmental sustainability by incorporating sustainable building features and construction protocols required by the Los Angeles Green Building Code (LAMC Chapter IX, Article 9), the California Green Building Standards Code (California Code of Regulations, Title 24, Part 11; referred to as the CALGreen Code), and the California Building Energy Efficiency Standards (California Code of Regulations, Title 24, Part 6; California Energy Code), pursuing U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Gold certification or equivalent green building standards. The Project represents an infill development located in close proximity to existing and proposed transit lines and would utilize existing infrastructure to service the proposed uses. The Project also involves the restoration and rehabilitation of certain existing buildings and facilities. Both in compliance with and, in some cases, in exceedance of regulatory requirements, a number of specific sustainable design components would be incorporated into the Project, including, but not limited to: Energy Star appliances; solar panels; plumbing fixtures and fittings that comply with the performance requirements specified in the Los Angeles Green Building Code; weather-based irrigation systems; water-efficient plantings with drought-tolerant species; shade trees in public areas; green walls in some outdoor areas; vegetated roofs or cool roof systems to help reduce energy use; short- and long-term bicycle parking; electric vehicle (EV) charging infrastructure; a TDM Program; the proposed Mobility Hub; use of daylighting where feasible; energy-efficient lighting; and permeable paving where appropriate. Such measures would promote energy conservation, water conservation, and waste reduction.

Furthermore, as previously described, the Project would create pedestrian-friendly areas along Beverly Boulevard, Fairfax Avenue, The Grove Drive and the Southern Shared Access Drive and incorporate new landscaping along all public frontages. Sidewalks around the Project Site perimeter would be expanded in certain areas and upgraded with new landscaped parkways and frontage areas, to meet the City's sidewalk requirements, provide transitions between sidewalks and building edges, further separate pedestrians from vehicle traffic, and screen certain Project components such as parking areas. Thus, the Project would increase the comfort and well-being of users.

Guideline 10: Enhance green features to increase opportunities to capture stormwater and promote habitat.

Under the City's LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspired, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the 85th percentile storm event. The Project Site does not currently have structural BMPs in place for the treatment of stormwater runoff from existing impervious surfaces, such as building roof areas and

pavement, nor does the Project Site currently have a means of treatment for stormwater runoff. According to the Geotechnical Investigation prepared for the Project (see Appendix E of this Draft EIR), groundwater infiltration is not feasible for the Project Site. The next tier in the LID Manual is a stormwater capture and use system. Therefore, consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff from the Project Site, the Project would include the installation of a capture and use system to be used for irrigation purposes. If capture and use is later determined to not be feasible, the Project would implement high efficiency biofiltration/bioretenion systems pursuant to LID requirements. The installed BMP systems would be designed with an internal bypass overflow system to prevent upstream flooding during major storm events. The stormwater which bypasses the BMP systems would discharge to an approved discharge point in the public right-of-way. As the majority of potential contaminants are anticipated to be contained within the “first flush” 85th percentile storm event, major storms are not anticipated to cause an exceedance of regulatory standards. As is typical of most urban developments, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. Anticipated and potential pollutants generated by the Project would include sediment, nutrients, pesticides, metals, pathogens, and oil and grease, similar to existing conditions. The implementation of BMPs required by the City’s LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Further, the introduction of BMPs on-site to treat stormwater runoff would represent an improvement as compared to existing conditions. As such, the Project would increase opportunities to capture stormwater.

(b) Consistency with Regional Plans

(i) 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS)

The Project’s consistency with the applicable goals set forth in the 2020–2045 RTP/SCS is analyzed in Table 3 of Appendix I of this Draft EIR. As detailed therein, the Project would not conflict with the applicable goals set forth in the 2020–2045 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support the 2020–2045 RTP/SCS goals to improve mobility and accessibility; support healthy and equitable communities; increase travel choices within the transportation system; reduce greenhouse gas emissions; and improve air quality. The Project would be developed within an existing urbanized area that provides an established network of roads and freeways that provide local and regional access to the area, including the Project Site. In addition, the Project Site is served by a variety of nearby mass transit options, including several bus lines. The availability and accessibility of public transit in the vicinity of the Project Site is documented by the Project Site’s location within a designated SCAG High-Quality Transit Area and City of Los Angeles Transit Priority Area, as defined in the City’s Zoning Information File No. 2452.

As previously discussed, the Project would include a TDM Program, including an educational program/on-site coordinator, bicycle parking and amenities, pedestrian amenities, shuttle service to the planned Metro D (Purple) Line Wilshire/Fairfax station, a ride-share matching and carpool/vanpool program, first-mile/last-mile options, a Guaranteed Ride Home Program, and a Mobility Hub with a transportation information center/kiosks. The proposed Mobility Hub would support first/last mile connections; encourage employee and visitor use of public transit, carpooling, vanpooling, and biking/scooter to work; and support other TDM strategies. The Mobility Hub would provide an off-street space for Television City employees and visitors to access passenger pick-up/drop-off zones, carpools, vanpools, shuttles, ride-share, taxis, and other commercial and non-commercial vehicles, and the temporary parking of buses. The Mobility Hub would also include space to accommodate support uses, storage, maintenance, staging facilities, bike share, and ridership amenities. In addition, the Project would provide bicycle parking spaces for the proposed uses that would promote walking and the use of bicycles. Specifically, the Project would provide short-term and long-term bicycle parking spaces in accordance with LAMC requirements, including secured bicycle parking facilities, as well as valet service, showers, lockers, and bicycle service areas with repair stands within the Project Site. Furthermore, the Project Applicant would make a financial contribution for bicycle improvements under the Mobility Plan 2035, as well as pedestrian facilities improvements as part of the City's Vision Zero plan, as discussed further in Section IV.K, Transportation, of this Draft EIR.

Additionally, the Project would contribute to and implement traffic-calming measures as part of a Neighborhood Traffic Management Plan to address potential cut-through traffic on surrounding residential streets, as also discussed in Section IV.K, Transportation, of this Draft EIR. The Project would also include adequate parking to serve the proposed uses, including the provision of electric vehicle charging stations consistent with LAMC requirements. As such, the Project would provide opportunities for walking and biking and promote an improved quality of life, and the Project's TDM Program would encourage the use of public transit.

(ii) South Coast Air Quality Management District Air Quality Management Plan

As analyzed in Section IV.A, Air Quality, of this Draft EIR, the Project would not conflict with the applicable policies set forth in the SCAQMD's AQMP. Refer to the discussion therein.

(c) Conclusion Regarding Impacts Relative to Land Use Consistency

Based on the analysis provided above, the Project would not conflict with the goals, policies, and objectives in local and regional plans that were adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the Project

would not conflict with or impede the General Plan or Community Plan, or the environmental policies in other applicable plans adopted for the purpose of avoiding or mitigating an environmental effect. As such, impacts related to conflicts with applicable plans, policies, and regulations would be less than significant.

(2) Mitigation Measures

The Project's impact related to conflicts with applicable land use plans would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to conflicts with land use plans were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e. Project Impacts with Long-Term Buildout

While Project buildout is anticipated in 2026, the Project Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043. The Development Agreement would confer a vested right to develop the Project in accordance with the Specific Plan and a Mitigation Monitoring and Reporting Program (MMRP) throughout the term of the Development Agreement. The Specific Plan and MMRP would continue to regulate development of the Project Site and provide for the implementation of all applicable Project design features and mitigation measures associated with any development activities during and beyond the term of the Development Agreement. Additionally, land use impacts do not vary substantially over the course of relatively short time frames. Therefore, a later buildout date would not affect the impacts or significance conclusions presented above.

f. Cumulative Impacts

(1) Impact Analysis

As indicated in Section III, Environmental Setting, of this Draft EIR, a total of 68 related development projects have been identified in the vicinity of the Project Site through 2026, the Project's anticipated buildout year.²⁴ The related projects comprise a

²⁴ While Project buildout is anticipated in 2026, the Project Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043. A later buildout date would not affect the cumulative impact analysis related to land use and planning.

variety of uses, including apartments, condominiums, restaurants, office space, institutional uses, and retail uses, as well as mixed-use developments incorporating some or all of these elements. The related projects generally consist of infill development and redevelopment of existing uses, which are encouraged by the land use policies for the Project vicinity. Furthermore, the related projects and the Project would increase employment opportunities in the Project vicinity, concentrate development near public transit, provide needed housing and amenities, and activate the surrounding area, consistent with local and regional goals and objectives. As with the Project, the related projects would be required to comply with relevant land use policies and regulations through review by City regulatory agencies and would be subject to CEQA review. Since the Project on the whole would be consistent with applicable land use plans and zoning standards, the Project would not incrementally contribute to cumulative inconsistencies with respect to land use plans and zoning standards. **Therefore, the Project and related projects would not result in significant cumulative impacts related to land use consistency. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts related to land use consistency would be less than significant.**

(2) Mitigation Measures

Cumulative impacts related to land use and planning would be less than significant. Thus, no mitigation measures would be necessary.

(3) Level of Significance After Mitigation

Cumulative impacts related to land use and planning would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.