V. Alternatives

V. Alternatives

1. Introduction

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

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

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

The CEQA Guidelines state that the discussion of project alternatives must focus on those alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the proposed project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.[1] The CEQA Guidelines further direct that the range of alternatives required in an EIR is governed by a "rule of reason," such that only those alternatives

[1] CEQA Guidelines Section 15126.6(b).

necessary to permit a reasoned choice are addressed.[2] In selecting project alternatives for analysis, potential alternatives must be feasible. CEQA Guidelines Section 15126.6(f)(1) states that:

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

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

2. Overview of Selected Alternatives

As discussed above, the intent of the alternatives analysis is to avoid or substantially lessen any of the significant effects of the Project while still feasibly obtaining most of the basic Project objectives. As discussed in Section II, Project Description, of this Draft EIR, the Project's underlying purpose is to maintain Television City as a studio use and to modernize and enhance production facilities within the Project Site to meet both the existing unmet and anticipated future demands of the entertainment industry, keep production activities and jobs in Los Angeles, upgrade utility and technology infrastructure, and create a cohesive studio lot. To achieve this underlying purpose, the Project Objectives are defined as follows:

- Create a fully integrated and cohesive master planned site regulated by a Specific Plan that retains the Project Site's land use as a studio facility and provides an expandable, flexible, and operationally seamless production ecosystem that is able to respond to evolving market demands, support content creation, and maximize studio production capabilities.

- Rehabilitate and preserve the integrity of the Primary Studio Complex consistent with the HCM designation and restore the currently obstructed public views of the HCM consistent with the HCM designation, while building upon Pereira & Luckman's master plan for a flexible and expandable studio campus.

[2] CEQA Guidelines Section 15126.6(f).

- Promote local and regional economic growth by creating a wide range of entertainment jobs as well as construction jobs and keeping production jobs in Los Angeles.

- Contribute to Los Angeles' status as a global creative capital and provide maximum opportunity for productions to be filmed in the region through the continued use and expansion of the Project Site as a major studio and entertainment institution, in conformance with the goals and objectives of applicable local and regional plans and policies.

- Optimize the currently underutilized Project Site to address past ad hoc building additions and meet the existing unmet and anticipated future demands of the entertainment industry by providing new technologically advanced sound stages combined with an adequate and complementary mix of state-of-the-art production support facilities and production offices.

- Complement the neighboring community through design elements that would be compatible with surrounding uses, concentrate building mass and height towards the center of the Project Site, and provide an enhanced public realm to promote walkability, foster connectivity and safety, and better integrate on- and off-site uses.

- Provide adequate, safe, and efficient ingress/egress, circulation, staging, and parking that satisfies the unique demands of a large-scale production studio with direct, enhanced access to the uses on-site and sufficient truck and trailer circulation areas, in compliance with modern fire and life safety requirements.

- Create multiple production basecamps to allow for the flexible and efficient staging of vehicles needed for film and television productions.

- Provide multi-modal transportation solutions, including a Project Mobility Hub, to connect TVC employees and guests with surrounding public transit lines, employee shuttles, and a rideshare program, to encourage alternative means of transportation, and focus growth in a high-density, jobs-rich area in close proximity to transit.

- Create a model for environmental sustainability in modern production studio operations by implementing best management practices regarding water, energy, and resource conservation.

- Enhance the identity of the Project Site as an iconic entertainment and media center by providing architecturally distinct development and a creative signage program that reflects and complements the production uses on-site.

- Permit a reasonable, risk-adjusted return on investment commensurate with the Project Applicant's fiduciary responsibilities and allow for sustained economic

viability and growth in an evolving entertainment market, while generating tax and property revenues to the City.

Based on the analyses provided in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with respect to:

- Regional construction-related emissions of nitrogen oxides (NO_X);
- On- and off-site noise during construction; and
- On- and off-site vibration during construction (based on the significance threshold for human annoyance).

With regard to cumulative impacts, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with respect to:

- Regional construction-related NO_X emissions;
- On- and off-site noise during construction; and
- Off-site vibration during construction (based on the significance threshold for human annoyance).

Under a potential long-term buildout scenario, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with respect to:[3]

- Project-level and cumulative impacts associated with emissions of NO_X and volatile organic compounds (VOC) due to concurrent construction and operations.

The selection of Project alternatives necessarily took into consideration the physical development constraints on the Project Site due to the existing Historic-Cultural Monument (HCM) on-site. The original Primary Studio Complex, which is located generally in the center of the Project Site and includes two attached buildings (the Service Building on the east and the Studio Building on the west), was designated as HCM No. 1167 on June 26, 2018 (CHC-2018-476-HCM).[4] The HCM designation established a protected viewshed to

[3] 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.

[4] Refer to Section IV.B, Cultural Resources, of this Draft EIR for a detailed discussion of the Primary Studio Complex.

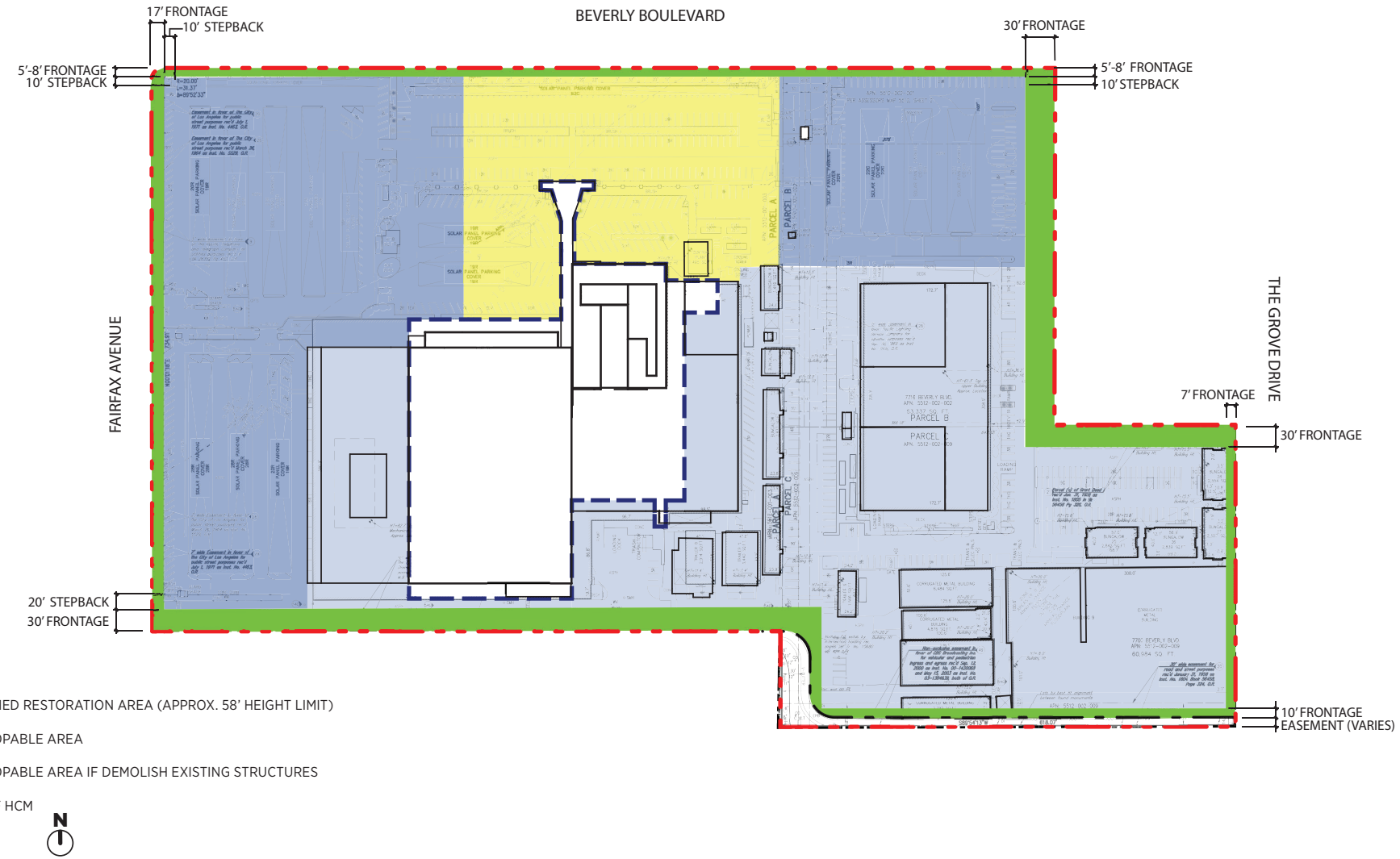
limit building height in front of the Primary Studio Complex, extending 430 linear feet west from Genesee Avenue along Beverly Boulevard and extending southward toward the Primary Studio Complex (Viewshed Restoration Area), as shown in Figure V-1 on page V-6.[5] Any development in these areas would be limited by the HCM designation. Additionally, all of the potential Project alternatives were assumed to include the same frontage areas and building stepbacks as the Project in order to provide adequate space for public realm improvements, reduce building massing along the street frontages, and help create an appropriately scaled public/private realm interface. As such, new development would be largely confined to the eastern and western sides of the Project Site, as shown in Figure V-1.

Based on the significant construction-related environmental impacts of the Project, the basic objectives established for the Project, the development constraints described above, and the feasibility of the various alternatives considered, the Project alternatives listed below were selected for evaluation:

- **Alternative 1—No Project/No Build Alternative:** Alternative 1 assumes that the Project would not be approved, no new permanent development would occur within the Project Site, and the existing environmental setting would be maintained. Under Alternative 1, the physical conditions of the Project Site would generally remain as they were at the time the notice of preparation (NOP) was published for the Project. Specifically, the existing buildings and uses, as well as the surface parking areas, would remain on the Project Site, and no new construction would occur aside from ongoing production activities.

- **Alternative 2—Development in Accordance with Existing Zoning Alternative:** Alternative 2 would involve buildout of the Project Site in accordance with the existing zoning and land use regulations for the Project Site. Alternative 2 would include a total of an estimated 1,600,666 square feet of studio-related development and a Floor Area Ratio (FAR) of 1.49:1. Alternative 2 assumes the construction of an estimated 856,986 square feet of new studio-related general office uses and the retention of all an estimated 743,680 square feet of existing development. No demolition would occur under Alternative 2. New development would include a 15-story office building (maximum height of 203 feet) with four levels of subterranean parking and three levels of above-ground parking, and a six-level parking structure (maximum height of 66 feet) with two levels of subterranean parking. Approximately 4,550 parking spaces would be provided.

[5] The HCM designation is attached as Appendix C to the Historical Resources Technical Report for the TVC 2050 Project, included as Appendix C of this Draft EIR.



Assumes the same frontage areas and stepbacks as the Project.

Figure V-1
Developable Area of the Project Site

Source: Rios, 2022.

- **Alternative 3—Reduced Density Alternative:** Alternative 3 would involve a 20-percent reduction in the Project's proposed development program set forth in Section II, Project Description, of this Draft EIR. Alternative 3 consists of the same general site plan as the Project but with certain reduced building heights and square footages. Alternative 3 would include a total of an estimated 1,499,200 square feet of development (FAR of 1.4:1), including an estimated 280,000 square feet of sound stages, 83,200 square feet of production support, 560,000 square feet of production office, 560,000 square feet of general office, and 16,000 square feet of retail uses. Alternative 3 would involve the construction of an estimated 1,251,380 square feet of new development, the demolition of 495,860 square feet of existing studio-related uses and the retention of an estimated 247,820 square feet of existing studio-related uses. Approximately 4,240 parking spaces would be provided.

- **Alternative 4—Mixed-Use Alternative:** Alternative 4 would involve a mixed-use development with studio, residential, and retail uses. Alternative 4 would be developed in accordance with the existing zoning and land use designations for the Project Site and would seek a maximum FAR of up to 3.75:1, per Transit Oriented Community (TOC) Tier 3. Alternative 4 would include a total of 3,696,370 square feet of development (FAR of 3.45:1), including approximately 2,772,000 square feet of residential uses and 924,370 square feet of commercial uses. Alternative 4 assumes the construction of 3,047,400 square feet of new development, the demolition of 94,710 square feet of existing studio-related uses, and the retention of 648,970 square feet of existing studio-related uses. In addition to residential uses, this alternative would include 36,000 square feet of sound stages, 41,400 square feet of production support, 138,000 square feet of general office uses, and 60,000 square feet of retail uses. The residential uses would include 3,680 units within three residential towers, with a mix of studios and one-, two- and three-bedroom units, of which 14 percent (516 units) would be affordable units for Very Low-Income households. The residential towers would be located along the western side of the Project Site, fronting Fairfax Avenue, and would consist of 30 stories over a six-level parking podium (maximum height of 400 feet), with ground floor retail uses and four levels of subterranean parking. New development on the eastern portion of the Project Site would include a six-story office building (maximum height of 90 feet) with two levels of subterranean parking, a four-story production support building (maximum height of 60 feet) connected two single-story sound stages (maximum height of 60 feet), and a four-level parking structure (maximum height of 45 feet) with three levels of subterranean parking. Approximately 5,880 parking spaces would be provided.

- **Alternative 5—Above-Ground Parking Alternative:** Alternative 5 has been designed to eliminate subterranean parking in order to reduce excavation and export. Alternative 5 would include the same development program, square footages, and general layout as the Project, except that all parking would be located in above-ground structures. As a result, building heights would increase. Alternative 5 would involve the same demolition and retention of existing uses

and the same FAR as the Project. Approximately 5,300 parking spaces would be provided.

Table V-1 on page V-9 provides a comparison of development associated with the Project and the five alternatives being considered. Each of these alternatives is described and evaluated in the sections that follow. In addition, CEQA Guidelines Section 15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible, and such rejected alternatives are described below.

Table V-1
Summary Comparison of Development Proposed under the Project and Alternatives

Development Component	)Proposed Development Program	Alternative 1: No Project/No Build Alternative	Alternative 2: Development in Accordance with Existing Zoning Alternative	Alternative 3: Reduced Density Alternative	Alternative 4: Mixed-Use Alternative	Alternative 5: Above-Ground Parking Alternative
Sound Stages	350,000 sf	95,540 sf	—	280,000 sf	36,000 sf	350,000 sf
Production Support	104,000 sf	325,450 sf	—	83,200 sf	41,400 sf	104,000 sf
Production Office	700,000 sf	163,090 sf	—	560,000 sf	—	700,000 sf
General Office	700,000 sf	159,600 sf	856,986 sf	560,000 sf	138,000 sf	700,000 sf
Retail	20,000 sf	—	—	16,000 sf	60,000 sf	20,000 sf
Residential	—	—	—	—	2,772,000 sf (3,680 units)	—
Demolition	(495,860) sf	—	—	(495,860 sf)	(94,710 sf)	(495,860) sf
Existing Floor Area to Remain	247,820 sf	743,680 sf	743,680 sf	247,820 sf	648,970 sf	247,820 sf
New Construction	1,626,180 sf	—	856,986 sf	1,251,380 sf	3,047,400 sf	1,626,180 sf
Total Floor Area	1,874,000 sf	743,680 sf	1,600,666 sf	1,499,200 sf	3,696,370 sf	1,874,000 sf
Net Change in Floor Area	**+1,130,320 sf**	0	**+856,986 sf**	**+755,520 sf**	**+2,952,690 sf**	**+1,130,320 sf**
FAR	**1.75:1**	**0.7:1**	**1.49:1**	**1.4:1**	**3.45:1**	**1.75:1**
Parking Provided	5,300 sp	1,510 sp	4,550 sp	4,240 sp	5,880 sp	5,300 sp
Maximum Permitted Height	225 ft	Unlimited[a,b]	Unlimited[a,c]	225 ft	400 ft	225 ft
Maximum Depth of Excavation	45 ft	—	48 ft	45 ft	48 ft	15 ft
Soil Export	772,000 cy	—	315,000 cy	772,000 cy	505,000 cy	154,000 cy

cy = cubic yards
du = dwelling units
FAR = floor area ratio
ft = feet
sp = spaces
sf = square feet

[a] *LAMC Section 12.21.1 restricts building height in numerous residential areas as well as for parcels located within hillside and coastal zones. As the Project Site*

Table V-1 (Continued)
Summary Comparison of Development Proposed under the Project and Alternatives

Development Component	)Proposed Development Program	Alternative 1: No Project/No Build Alternative	Alternative 2: Development in Accordance with Existing Zoning Alternative	Alternative 3: Reduced Density Alternative	Alternative 4: Mixed-Use Alternative	Alternative 5: Above-Ground Parking Alternative
is commercially zoned, designated as Height District 1, and not located within a hillside or coastal zone area, there is no limitation with regard to height. While additional limitations were approved for a portion of Television City under Ordinance No. 171,432, those limitations pertain to floor area, not building height. Therefore, per LAMC, those portions of the Project Site zoned either C2-1-O or C1.5-2D-O are permitted to have unlimited height.						
[b] *Alternative 1 assumes an actual maximum building height of 88 feet, consistent with existing conditions.*						
[c] *Alternative 2 assumes an actual maximum building height of 203 feet based on the conceptual site plan.*						
Source: Rios and Eyestone Environmental, 2022.						

3. Alternatives Considered and Rejected as Infeasible

As set forth in CEQA Guidelines Section 15126.6(c), the range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the Project and could avoid or substantially lessen one or more of the significant impacts. As further set forth in CEQA Guidelines Section 15126.6(c), the EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should specifically identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate an alternative from detailed consideration are the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Based on these CEQA Guidelines, alternatives to the Project that have been considered and rejected include the following:

- **Alternative Site:** The objectives of the proposed Project are closely tied to the need to improve existing operations on the currently underutilized Project Site by creating a cohesive and integrated studio campus environment with new technologically advanced facilities. To meet the Project's objective to provide an expandable, flexible, and operationally seamless production ecosystem that is able to respond to evolving market demands, support content creation, and maximize studio production capabilities, the Project Applicant has identified improvements that are needed to bring the existing studio in line with modern production techniques and trends and to meet the significant and unmet demand for production space in Los Angeles. To this end, a central guiding principle behind the Project is to maximize the number of state-of-the-art sound stages on-site, combined with an adequate and complementary mix of production support facilities and production offices in order to meet the existing unmet and anticipated future demands of the entertainment industry. This goal is influenced by the inherent challenges posed by the existing development on-site, including the age and layout of the existing facilities, as well as the need to rehabilitate and preserve the integrity of the Primary Studio Complex consistent with the HCM designation. Many of the existing production facilities on-site have been developed in an ad hoc manner over the years, resulting in inefficiencies and space constraints. Additionally, several of the existing sound stages on the Project Site are too small and outdated for the needs of the current market and technology.

- Modern production techniques call for more integrated, campus-like settings with additional spaces, including gathering, support, office, and post-production spaces, as much of the production work today is performed during post-production using specialized digital facilities for editing and adding digital effects, graphics, special effects, sound, etc. Modern production space also requires

production-related land uses in different ratios today than in the past due to the changing nature of the production process. Production facilities now use high-tech equipment and techniques to enhance quality and substitute virtual space for what was previously done with physical models or other cinematic techniques. Also, new media is continuously being created to enhance the entertainment experience, such as virtual media, online entertainment, and video games. Modern media production calls for new types of post-production spaces, increased office space, and integrated gathering spaces that foster collaboration and information exchange across the multitude of disciplines that comprise the modern studio.

Development on an alternative site would result in no changes to existing on-site conditions, which would therefore provide no potential to achieve the basic Project objectives related to: modernizing and enhancing production facilities within Television City; rehabilitating the Primary Studio Complex and restoring the currently obstructed public views of the HCM; optimizing the currently underutilized Project Site to address past ad hoc building additions; and enhancing the identity of the Project Site as an iconic entertainment and production facility. Furthermore, development on an alternative site would split studio operations into two locations, which would substantially reduce operational efficiency and functionality and increase vehicle miles traveled (VMT) and related air quality and GHG impacts.

As all of the Project's significant and unavoidable impacts are related to construction activities, development on another site would not avoid or substantially lessen the Project's significant impacts. It is anticipated that development on an alternative site would still produce the significant construction-related air quality, noise, and vibration impacts as the Project, albeit in a different location. Moreover, depending on localized and site-specific conditions, development at another location could result in additional significant impacts, such as new traffic impacts in an area where transit options are not as plentiful or readily available. Finally, the Project Applicant already owns the Project Site, and it is not reasonable to assume that Television City's operations could be feasibly divided and transferred to another site.

Based on the above, an alternative site is not considered feasible as it would fail to achieve the basic project objectives related to modernizing the Project Site, providing new environmentally friendly and state-of-the-art sustainable facilities on the Project Site, creating an integrated, studio campus environment with a synergistic mix of uses, rehabilitating and preserving the integrity of the HCM, and enhancing the role of the Project Site in the entertainment industry. In addition, the development of an alternative site would not avoid or substantially lessen the Project's significant impacts. Thus, in accordance with Section 15126.6(f) of the CEQA Guidelines, this alternative was rejected from further consideration.

- **Alternatives that Remove or Substantially Modify the Primary Studio Complex:** Given that the Primary Studio Complex is designated as an HCM, any alternative that would remove or substantially alter the HCM such that its historic integrity and eligibility would be compromised was rejected as infeasible. Similarly, alternatives that would introduce substantial development within the Viewshed Restoration Area were eliminated from consideration since they would be inconsistent with the HCM designation. Thus, any alternatives that would compromise the HCM were rejected as infeasible.

- **Alternatives that Eliminate the Project's On-Site Construction Noise and Vibration Impacts:** An analysis was performed to determine whether the Project's significant impacts related to on-site construction noise and on-site vibration could be substantially reduced or avoided through an alternative development program. As shown in Table IV.I-10 in Section IV.I, Noise, of this Draft EIR, all stages of Project construction would cause a significant noise impact affecting the adjacent residential use (R1 [i.e., Broadcast Center Apartments]) given its proximity to on-site construction activities. In order to eliminate this impact, construction activities would need to be moved approximately 700 feet westerly from the Shared Eastern Property Line; in other words, new development could not occur on over half of the Project Site. Accordingly, this alternative was rejected as infeasible.

  Another alternative that was considered involved moving construction activities away from the adjacent residential building combined with the use of a tall sound wall. If development were moved approximately 100 feet westerly from the Shared Eastern Property Line, then a 30-foot-tall sound wall extending nearly 1,000 feet along the Shared Eastern Property Line would need to be erected in order to substantially reduce noise impacts at the fourth story of the apartment building. Not only would this be cost prohibitive, but a wall of this size would block views and sunlight for all of the west and south facing residential units of the adjacent building for the duration of the construction period. Therefore, this alternative was rejected from further consideration.

  With respect to on-site vibration, as discussed in Section IV.I, Noise, of this Draft EIR and shown in Table IV.I-21 therein, Project construction activities involving a large bulldozer, caisson drilling, jackhammer, or loaded trucks would exceed the vibration threshold with respect to human annoyance at the adjacent residential building (R1). As ground-borne vibration generated by human activities attenuates rapidly with distance from the vibration source, this impact could be reduced to a less-than-significant level by moving construction activities using heavy equipment at least 80 feet westerly from the Shared Eastern Property Line. While the Project's significant and unavoidable vibration impact would be reduced to a less-than-significant level, this alternative would render a substantial portion of the Project Site undevelopable, and a significant construction-related noise impact would continue to occur. As such, this alternative was rejected from further consideration.

- **Tier 3 TOC Alternative Use with Maximum FAR:** As previously discussed, the Project Site is located in TOC Tier 3, which allows a maximum FAR of 3.75:1. Based on a site area of 1,071,011 square feet, this would allow 4,016,291 square feet of development, including over 4,500 residential units (TOC Tier 3 allows a 70 percent density bonus). The building heights, parking needs, and other space constraints associated with this maximum FAR scenario would yield both building massing and an overall density that would be greater than the surrounding predominantly low- and mid-rise land uses and would result in substantial increases in environmental impacts (e.g., operational air quality impacts, public services and utilities impacts, etc.). Therefore, this alternative was rejected from further consideration.

4. Alternatives Analysis Format

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the Project objectives, identified in Section II, Project Description, of this Draft EIR, would be substantially attained by the alternative.[6] The evaluation of each of the alternatives follows the process described below:

a. The net environmental impacts of the alternative are determined for each environmental issue area analyzed in Section IV, Environmental Impact Analysis, of this Draft EIR, assuming that the alternative would implement the same Project design features and mitigation measures identified in Section IV, Environmental Impact Analysis, of this Draft EIR.

b. Post-mitigation significant and non-significant environmental impacts of the alternative and the Project are compared for each environmental issue as follows:

    - Less: Where the net impact of the alternative would be clearly less adverse or more beneficial than the impact of the Project, the comparative impact is concluded to be less.

    - Greater: Where the net impact of the alternative would clearly be more adverse or less beneficial than the Project, the comparative impact is concluded to be greater.

[6] CEQA Guidelines Section 15126.6(c).

- Similar: Where the impact of the alternative and Project would be roughly equivalent, the comparative impact is concluded to be similar.

c. The comparative impact analysis is followed by a general discussion of whether the underlying purpose and basic Project objectives would be feasibly and substantially attained by the alternative.

A summary matrix that compares the impacts associated with the Project with the impacts of the alternatives analyzed below is provided in Table V-2 on page V-16.

Table V-2
Comparison of Impacts Associated with the Alternatives

Impact Area	Proposed Development Program	Alternative 1: No Project/No Build Alternative	Alternative 2: Development in Accordance with Existing Zoning Alternative	Alternative 3: Reduced Density Alternative	Alternative 4: Mixed-Use Alternative	Alternative 5: Above-Ground Parking Alternative
A. AIR QUALITY[a]						
Regional Emissions						
Construction	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Greater (Significant and Unavoidable)	Less (Less Than Significant w/ Mitigation)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Significant and Unavoidable)	Similar (Less Than Significant)
Concurrent Construction and Operation	Significant and Unavoidable	Less (No Impact)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)	Greater (Significant and Unavoidable)	Less (Significant and Unavoidable)
Localized Emissions						
Construction	Less Than Significant w/ Mitigation	Less (No Impact)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Toxic Air Contaminants						
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Similar (Less Than Significant)
B. CULTURAL RESOURCES						
Historical Resources	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Archaeological Resources	Less Than Significant w/ Mitigation	Less (No Impact)	Less (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)
C. ENERGY						
Wasteful, inefficient, or unnecessary consumption of Energy Resources						
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Conflict with Plans for Renewable Energy or Energy Efficiency	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
D. GEOLOGY AND SOILS						
Geologic Hazards	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Paleontological Resources	Less Than Significant w/ Mitigation	Less (No Impact)	Less (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)
E. GREENHOUSE GAS EMISSIONS						
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Similar (Less Than Significant)
F. HAZARDS AND HAZARDOUS MATERIALS						
Construction	Less Than Significant w/ Mitigation	Less (No Impact)	Less (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)

Table V-2 (Continued)
Comparison of Impacts Associated with the Alternatives

Impact Area	Proposed Development Program	Alternative 1: No Project/No Build Alternative	Alternative 2: Development in Accordance with Existing Zoning Alternative	Alternative 3: Reduced Density Alternative	Alternative 4: Mixed-Use Alternative	Alternative 5: Above-Ground Parking Alternative
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Similar (Less Than Significant)
G. HYDROLOGY AND WATER QUALITY						
Surface Water Quality						
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Similar (Less Than Significant)
Groundwater Quality						
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Similar (Less Than Significant)
Surface Water Hydrology						
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Groundwater Hydrology						
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
H. LAND USE AND PLANNING						
Conflict with Land Use Plans	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
I. NOISE[b]						
Construction						
On-Site Noise	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Off-Site Noise	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Less (Significant and Unavoidable)
On-Site Vibration (Building Damage)	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
On-Site Vibration (Human Annoyance)	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Off-Site Vibration (Building Damage)	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Off-Site Vibration (Human Annoyance)	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Operation						
On-Site Noise	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Off-Site Noise	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Vibration	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)

Table V-2 (Continued)
Comparison of Impacts Associated with the Alternatives

Impact Area	Proposed Development Program	Alternative 1: No Project/No Build Alternative	Alternative 2: Development in Accordance with Existing Zoning Alternative	Alternative 3: Reduced Density Alternative	Alternative 4: Mixed-Use Alternative	Alternative 5: Above-Ground Parking Alternative
J. PUBLIC SERVICES						
Fire Protection						
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Similar (Less Than Significant)
Police Protection						
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant	Similar(Less Than Significant)
K. TRANSPORTATION						
Conflict with Plans	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Vehicle Miles Traveled	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Similar (Less Than Significant)
Freeway Safety Analysis	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Similar (Less Than Significant)
L. TRIBAL CULTURAL RESOURCES						
Tribal Cultural Resources	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
M. UTILITIES AND SERVICE SYSTEMS						
Water Supply and Infrastructure						
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Similar (Less Than Significant)
Wastewater						
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Similar (Less Than Significant)
Energy Infrastructure						
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Similar (Less Than Significant)

[a] *Cumulative and Project-level localized emission impacts would be significant before mitigation and less than significant after mitigation. Cumulative and Project-level regional construction emissions would be significant and unavoidable.*

[b] *Project-level impacts associated with on- and off-site noise sources during construction and on- and off-site vibration during construction (pursuant to the significance threshold for human annoyance) would be significant and unavoidable. Cumulative impacts associated with on- and off-site noise during construction and on- and off-site vibration during construction (pursuant to the significance threshold for human annoyance) would also be significant and unavoidable.*

Source: Eyestone Environmental, 2022.

V. Alternatives

A. Alternative 1: No Project/No Build Alternative

1. Description of the Alternative

In accordance with the CEQA Guidelines, the "no project" alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. CEQA Guidelines Section 15126.6(e)(3)(B) states in part that "in certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, Alternative 1, the No Project/No Build Alternative, assumes that the Project would not be approved, no new permanent development would occur within the Project Site, and the existing environment, as described in Section II, Project Description, of this Draft EIR, would be maintained. Thus, the physical conditions of the Project Site would generally remain as they are today. Specifically, the existing buildings and surface parking areas would remain on the Project Site, and no new construction, aside from ongoing production activities, would occur. The site plan for Alternative 1, which reflects existing conditions at the Project Site, is provided in Figure V-2 on page V-20.

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

Alternative 1 would not alter existing development or involve any new construction activities on the Project Site. Therefore, no construction-related air quality impacts associated with regional and localized emissions would occur. Impacts would be less than the Project's construction-related significant and unavoidable impacts associated with regional emissions and the less-than-significant-with-mitigation impacts associated with localized emissions. In particular, the Project's significant and unavoidable impact related to regional NOx emissions would be avoided.

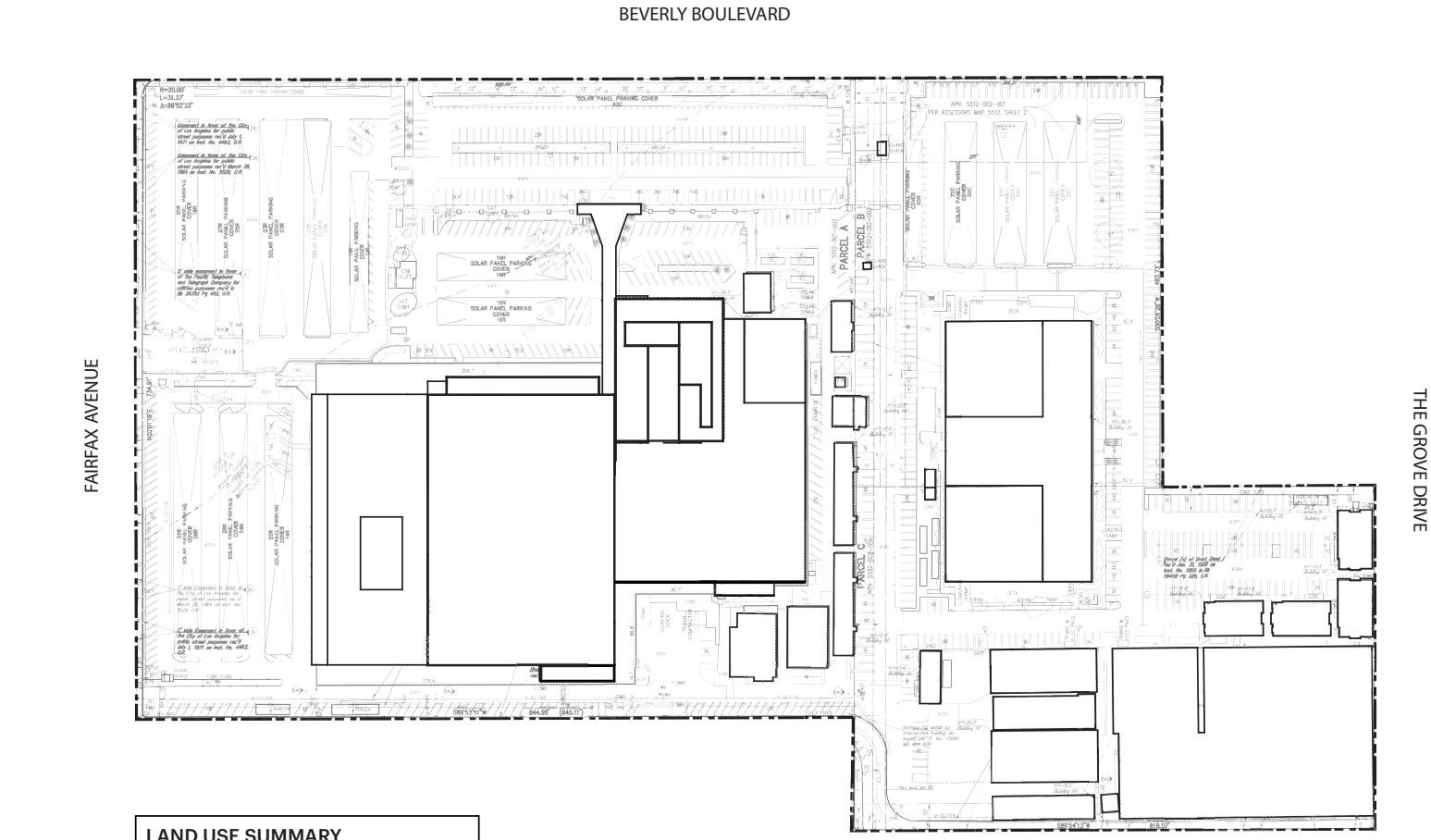


Figure V-2
Alternative 1 Site Plan

Source: Rios, 2022.

(b) Toxic Air Contaminants

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

(2) Operation

(a) Regional and Localized Air Quality Impacts

Alternative 1 would not result in new development or increased operations that could generate additional operational emissions related to vehicular traffic or the consumption of electricity beyond what is currently generated by the existing uses and activities on the Project Site. Therefore, no operational air quality impacts associated with regional and localized emissions would occur. As a result, Alternative 1 would avoid the Project's less-than-significant project-level and cumulative impacts associated with regional and localized operational emissions. Impacts would be less than under the Project.

(b) Toxic Air Contaminants

Alternative 1 would not result in new development or increase the intensity of the existing uses on the Project Site. Therefore, no increase in mobile source emissions or their associated TACs would occur. No operational impact associated with TACs would occur, and such impact would be less than the Project's less-than-significant impact.

(3) Concurrent Construction and Operation

With no new construction activities, Alternative 1 would not generate concurrent construction and operational emissions. Impacts would be less than the Project's significant and unavoidable impacts associated with regional emissions during concurrent construction and operations. Specifically, the Project-level and cumulative impacts associated with emissions of NO_X and VOCs under a potential long-term buildout scenario would be avoided.

b. Cultural Resources

(1) Historical Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, the Project Site includes the original Primary Studio Complex, which is designated as Historic-Cultural Monument (HCM) No. 1167. In addition, several historical resources are located nearby in

the surrounding area. However, Alternative 1 would not involve any construction activities that could affect on-site or nearby historical resources, and no new buildings or changes to the physical environment that could affect the historical context of the on-site or nearby historical resources would be introduced. Therefore, Alternative 1 would not result in impacts to historical resources, and the Project's less-than-significant impacts would be avoided. However, without the Project, the Primary Studio Complex would not be rehabilitated, and the currently compromised character-defining features, as well as the visibility and prominence of the Primary Studio Complex from Beverly Boulevard, would not be restored. Thus, the Project benefits relating to the HCM would not be achieved.

(2) Archaeological Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, South Central Coastal Information Center (SCCIC) records indicate that one historic-period archaeological resource is located to the south of the Project Site and consists of a brick-lined structure and historic trash scatter dating between the 1910s and 1940s. No archaeological resources have been previously recorded within the Project Site. As no construction or earthwork would occur under Alternative 1, no impact with respect to archaeological resources would occur. Therefore, impacts would be less than the less-than-significant-with-mitigation impacts of the Project.

c. Energy

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

Construction activities would not occur under Alternative 1. Therefore, Alternative 1 would not generate a short-term demand for energy during construction, and construction-related impacts to energy would not occur. This impact would be less than the Project's less-than-significant impact.

With regard to operations, Alternative 1 would not alter the existing land uses or operations on the Project Site. Therefore, Alternative 1 would not increase the long-term energy demands on the Project Site, and no impact would occur. This impact would be less than the Project's less-than-significant impacts.

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

Alternative 1 would not alter the existing land uses or site operations on the Project Site. However, unlike the Project, Alternative 1 would not include new buildings meeting updated energy efficiency requirements, such as those set forth in the 2019 California Green Building Standards Code (CalGreen Code) and the Los Angeles Green Building

Code. Some of the existing inefficiencies related to energy would likely persist, including outdated technology and building systems such as heating, ventilation, and air conditioning (HVAC) equipment. Nevertheless, no new energy impact would occur, and impacts would be less than the less-than-significant impacts of the Project.

d. Geology and Soils

(1) Geologic Hazards

No construction or earthwork would occur under Alternative 1. Therefore, no impact with respect to geologic hazards would occur, and impacts would be less than the less-than-significant impacts of the Project.

(2) Paleontological Resources

As discussed in Section IV.D, Geology and Soils, of this Draft EIR, according to a records search of the paleontological specimen and locality records held by the Natural History Museum of Los Angeles (LACM) Vertebrate Paleontology Department and the Paleontology Technical Report prepared by Dudek, there are no previously encountered fossil vertebrate localities located within the Project Site. However, localities have been documented elsewhere in the surrounding area from the same geologic units that occur beneath portions of the Project Site, and several of these localities are located within approximately 2,000 feet of the Project Site. However, as no construction or earthwork would occur under Alternative 1, no impact with respect to paleontological resources would occur. Thus, impacts would be less than the less-than-significant-with-mitigation impacts of the Project.

e. Greenhouse Gas Emissions

Alternative 1 would not involve the development of any new uses on the Project Site. Therefore, no new greenhouse gas (GHG) emissions would be generated, and no new impact associated with global climate change would occur. As such, any impact associated with GHG emissions would be less than the Project's less-than-significant impact.

f. Hazards and Hazardous Materials

(1) Construction

Construction and earthwork activities would not occur under Alternative 1. Therefore, Alternative 1 would not involve any new use, handling, storage, or disposal of construction-related hazardous materials, nor would there be any potential to expose or release

potentially contaminated soil or subsurface gases. Although no impact would occur, Alternative 1 would not implement the Project's Soil Management Plan which would remediate existing conditions (as discussed in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, certain areas of on-site soils and groundwater contain residual constituents associated with a former Texaco station). Nonetheless, impacts would be less than the less-than-significant-with-mitigation impacts of the Project.

(2) Operation

Alternative 1 would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not involve any new or increased use, handling, storage, or disposal of hazardous materials, hazardous emissions, or upset or accident conditions. No impacts would occur, and impacts would be less than the Project's less-than-significant impacts.

g. Hydrology and Water Quality

(1) Surface Water Hydrology

(a) Construction

As no new development would occur, Alternative 1 would not involve construction activities that could alter the existing drainage patterns and flows on-site. Therefore, no construction-related impacts to surface water hydrology would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Under Alternative 1, no new permanent development would occur, and existing development and activities would remain unchanged. Therefore, Alternative 1 would not alter the amount of pervious surfaces on the Project Site, and no modifications to the existing drainage patterns or increase in the volume of runoff generated within the Project Site would occur. As such, no operational impacts to surface water hydrology would occur under Alternative 1, and such impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Surface Water Quality

(a) Construction

As no new development would occur, Alternative 1 would not involve any construction or earthwork activities that could contribute to pollutant loading in stormwater

runoff. Therefore, no construction-related impacts to surface water quality would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Under Alternative 1, no new permanent development would occur, and existing development and activities would remain unchanged. Therefore, Alternative 1 would not introduce any new pollutants or increase pollutant loadings in surface water runoff generated within the Project Site. As such, impacts to surface water quality during operations under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

(3) Groundwater

(a) Construction

As no construction or excavation would occur under Alternative 1, there would be no potential to encounter groundwater beneath the Project Site or expose any potentially contaminated soil or groundwater, and no construction dewatering would be necessary. Additionally, there would be no potential to affect groundwater levels, increase groundwater contamination, or cause regulatory water quality standards to be violated. Thus, no construction-related impacts to groundwater would occur under this alternative, and impacts would be less when compared to the Project's less-than-significant-with-mitigation impacts.

(b) Operation

Under Alternative 1, no new permanent development would occur that could increase impervious surfaces on-site, change groundwater recharge, or result in any new or increased generation of pollutants. Therefore, there would be no potential for Alternative 1 to affect groundwater levels, release contaminants into the groundwater, or cause a violation of regulatory water quality standards. Thus, no operational impacts to groundwater would occur, and impacts would be less when compared to the less-than-significant impacts of the Project.

h. Land Use and Planning

Under Alternative 1, there would be no changes to the physical or operational characteristics of the existing Project Site. No impacts associated with conflicts with land use plans or regulations would occur, and impacts would be less when compared to the less-than-significant impacts of the Project.

i. Noise

(1) Noise

(a) Construction

No new construction activities would occur under Alternative 1. As such, no construction-related on- or off-site noise impacts would occur under this alternative. As such, impacts would be reduced in comparison to the Project. Specifically, Alternative 1 would avoid the Project's significant unavoidable noise impacts associated with on-site construction equipment and off-site haul trips.

(b) Operation

Alternative 1 would not develop new uses on the Project Site, and no changes to existing site operations would occur. Thus, no new or increased stationary or mobile (e.g., traffic) noise sources would be introduced to the Project Site or in the surrounding vicinity. As such, no impacts associated with operational on- or off-site noise would occur under Alternative 1. Therefore, the operational noise impacts of Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

No construction-related vibration would be generated on- or off-site under Alternative 1, and no construction-related vibration impacts would occur. As such, construction-related vibration impacts (related to both building damage and human annoyance) would be less than the Project's impacts. Specifically, Alternative 1 would have a reduced level of impact relative to on- and off-site vibration related to the significance threshold for building damage. In addition, Alternative 1 would avoid the Project's significant and unavoidable impact related to the significance threshold for human annoyance due to on-site vibration associated with construction equipment and off-site vibration associated with haul trips during construction.

(b) Operation

Alternative 1 would not involve the development of new uses or facilities on the Project Site, and no changes to existing site operations would occur. Thus, no new on- or off-site vibration sources would be introduced within the Project Site or in the surrounding vicinity. As such, no impacts associated with operational on- and off-site vibration would occur under Alternative 1, and such impacts would be less when compared to the less-than-significant impacts of the Project.

j. Public Services

(1) Fire Protection

(a) Construction

As Alternative 1 would not include any construction activities, it would not result in a construction-related demand for Los Angeles Fire Department (LAFD) fire protection facilities or services. Thus, no construction-related fire protection impacts would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

No changes to the existing land uses or operations on the Project Site would occur under Alternative 1. Therefore, Alternative 1 would not increase fire safety hazards, generate new fire protection needs, require additional fire flows, or result in any changes to emergency access or response times. No impacts to fire protection facilities would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Police Protection

(a) Construction

As Alternative 1 would not include any construction, it would not result in a construction-related demand for police protection facilities or services from the Los Angeles Police Department (LAPD). Therefore, Alternative 1 would not result in any police protection impacts due to construction, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

No changes to existing on-site land uses or operations would occur under Alternative 1. Therefore, Alternative 1 would not increase the level of activity on-site, increase the service population of the LAPD stations serving the Project Site, generate new police protection needs, or result in any changes to emergency access or response times. No impacts to police protection facilities would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

k. Transportation

Since Alternative 1 would not involve the development of new or additional land uses on the Project Site, Alternative 1 would not generate any new construction-related or operational vehicle trips and associated vehicle miles traveled (VMT) or alter existing access/circulation within and surrounding the Project Site. Therefore, no impacts would occur with respect to operational traffic, including conflicts with programs, plans, ordinances, and policies addressing the circulation system; VMT; freeway safety; and emergency access. As such, impacts under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

l. Tribal Cultural Resources

Grading and other earthwork activities would not occur under Alternative 1. Therefore, there would be no potential for Alternative 1 to uncover subsurface tribal cultural resources. As such, no impacts to tribal cultural resources would occur under Alternative 1, and impacts would be less when compared to the Project's less-than-significant impacts.

m. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Construction activities would not occur under Alternative 1. Therefore, Alternative 1 would not generate a short-term demand for water during construction, and construction-related impacts to water supply and infrastructure would not occur. As such, impacts under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 would not alter the existing land uses or operations on the Project Site. Therefore, Alternative 1 would not increase the long-term water demand associated with the Project Site. No operational impacts to water supply and water infrastructure would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Construction activities would not occur under Alternative 1. Therefore, Alternative 1 would not generate wastewater during construction, and construction-related impacts to wastewater conveyance and treatment facilities would not occur. As such, impacts related to wastewater under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 would not alter the existing land uses or operations on the Project Site. Therefore, Alternative 1 would not increase operational wastewater flows from the Project Site. Since no operational impacts related to wastewater conveyance and treatment facilities would occur, impacts related to wastewater under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

(3) Energy Infrastructure

(a) Construction

Construction activities would not occur under Alternative 1. Therefore, Alternative 1 would not generate a short-term demand for energy during construction, and construction-related impacts to energy infrastructure would not occur. As such, impacts related to energy infrastructure under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 would not alter the existing land uses or operations on the Project Site. Therefore, Alternative 1 would not increase the long-term energy demand on the Project Site. Since no operational impacts related to energy infrastructure would occur under Alternative 1, impacts would be less when compared to the less-than-significant impacts of the Project.

3. Comparison of Impacts

Alternative 1 would avoid the Project's significant and unavoidable impacts with respect to regional construction emissions; on- and off-site noise sources during construction; and on- and off-site vibration (related to the significance threshold for human annoyance) during construction. In addition, Alternative 1 would avoid the Project's less-than-significant-with-mitigation impacts, including those related to localized air quality

emissions during construction, paleontological resources, hazards, and groundwater quality. Impacts associated with the remaining environmental issues also would be less than those of the Project.

4. Relationship of the Alternative to Project Objectives

Under Alternative 1, the existing buildings and associated surface parking would remain on the Project Site, and no new development would occur. As such, Alternative 1 would not meet the underlying purpose of the Project, which is to maintain Television City as a studio use and to modernize and enhance production facilities within the Project Site to meet both the existing unmet and anticipated future demands of the entertainment industry, keep production activities and jobs in Los Angeles, upgrade utility and technology infrastructure, and create a cohesive studio lot. Furthermore, Alternative 1 would not meet any of the Project Objectives, as listed below:

- Create a fully integrated and cohesive master planned site regulated by a Specific Plan that retains the Project Site's land use as a studio facility and provides an expandable, flexible, and operationally seamless production ecosystem that is able to respond to evolving market demands, support content creation, and maximize studio production capabilities.

- Rehabilitate and preserve the integrity of the Primary Studio Complex consistent with the HCM designation and restore the currently obstructed public views of the HCM consistent with the HCM designation, while building upon Pereira & Luckman's master plan for a flexible and expandable studio campus.

- Promote local and regional economic growth by creating a wide range of entertainment jobs as well as construction jobs and keeping production jobs in Los Angeles.

- Contribute to Los Angeles' status as a global creative capital and provide maximum opportunity for productions to be filmed in the region through the continued use and expansion of the Project Site as a major studio and entertainment institution, in conformance with the goals and objectives of applicable local and regional plans and policies.

- Optimize the currently underutilized Project Site to address past ad hoc building additions and meet the existing unmet and anticipated future demands of the entertainment industry by providing new technologically advanced sound stages combined with an adequate and complementary mix of state-of-the-art production support facilities and production offices.

- Complement the neighboring community through design elements that would be compatible with surrounding uses, concentrate building mass and height towards the center of the Project Site, and provide an enhanced public realm to promote walkability, foster connectivity and safety, and better integrate on- and off-site uses.

- Provide adequate, safe, and efficient ingress/egress, circulation, staging, and parking that satisfies the unique demands of a large-scale production studio with direct, enhanced access to the uses on-site and sufficient truck and trailer circulation areas, in compliance with modern fire and life safety requirements.

- Create multiple production basecamps to allow for the flexible and efficient staging of vehicles needed for film and television productions.

- Provide multi-modal transportation solutions, including a Project Mobility Hub, to connect TVC employees and guests with surrounding public transit lines, employee shuttles, and a rideshare program, to encourage alternative means of transportation, and focus growth in a high-density, jobs-rich area in close proximity to transit.

- Create a model for environmental sustainability in modern production studio operations by implementing best management practices regarding water, energy, and resource conservation.

- Enhance the identity of the Project Site as an iconic entertainment and media center by providing architecturally distinct development and a creative signage program that reflects and complements the production uses on-site.

- Permit a reasonable, risk-adjusted return on investment commensurate with the Project Applicant's fiduciary responsibilities and allow for sustained economic viability and growth in an evolving entertainment market, while generating tax and property revenues to the City.

V. Alternatives

B. Alternative 2: Development in Accordance with Existing Zoning Alternative

1. Description of the Alternative

Alternative 2, the Development in Accordance with Existing Zoning Alternative, considers development of the Project Site in accordance with the existing zoning and land use regulations for the Project Site, which 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) and designated as Community Commercial, Neighborhood Commercial, and Limited Commercial per the Wilshire Community Plan (Community Plan). The unincorporated County parcel, which would be annexed to the City, is zoned C-MJ (Major Commercial) and designated Major Commercial per the Los Angeles County 2035 General Plan. The C2 and C1.5 zones permit a variety of commercial land uses, including broadcasting studios, offices, and retail uses, and an FAR of up to 1.5:1. Alternative 2 would include an estimated total of 1,600,666 square feet of studio-related development and an FAR of 1.49:1.

More specifically, Alternative 2 assumes the construction of an estimated 856,986 square feet of new general office uses and the retention of 743,680 square feet of existing development. No building demolition would occur under Alternative 2. As shown in Figure V-3 on page V-33, new development would consist of a 15-story building in the western portion of the site along Fairfax Avenue, with 12 stories of general office uses over a three-level parking podium and a maximum building height of 203 feet.[7] In addition, a six-story parking garage with a maximum height of 66 feet would be located in the northeast corner of the Project Site fronting Beverly Boulevard east of Genesee Avenue. Under Alternative 2, height zones would not be established, as a Specific Plan would not be adopted.

Approximately 4,550 parking spaces would be provided within a combination of above- and below-ground parking structures and existing surface parking spaces.

[7] While the conceptual site plan for Alternative 2 illustrates a maximum building height of 203 feet, the underlying zoning allows unlimited building heights and thus taller building heights could be developed.

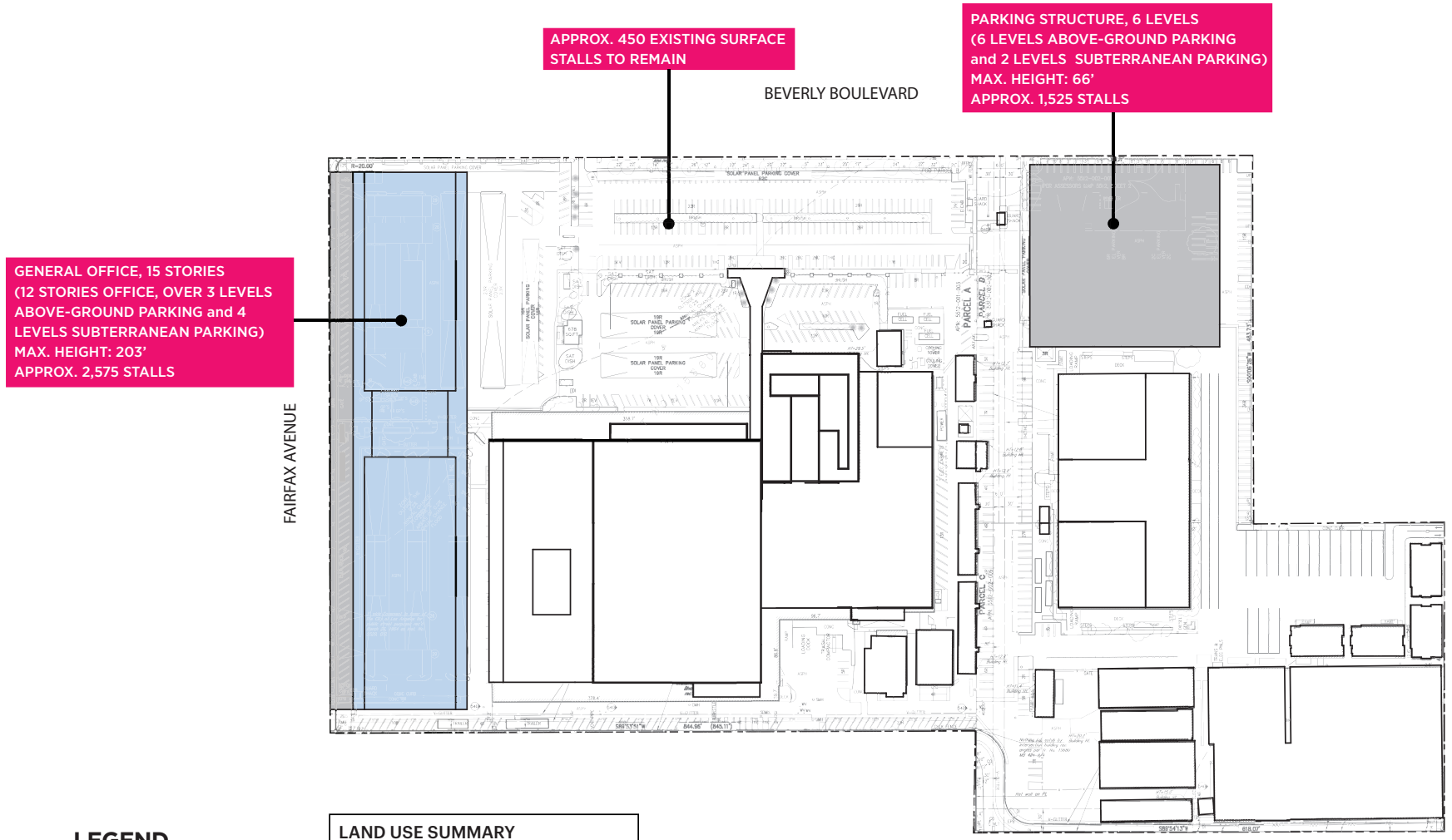


Figure V-3
Alternative 2 Conceptual Site Plan

Source: Rios, 2022.

Specifically, Alternative 2 would include a three-level parking podium along Fairfax Avenue over four subterranean parking levels, a six-level parking garage with two subterranean parking levels, and existing surface spaces in the northern portion of the Project Site along Beverly Boulevard and scattered throughout the Project Site. Alternative 2 would also include a Mobility Hub similar to the Project and the same frontage areas, building stepbacks, general landscape plan, and streetscape improvements as the Project. A conceptual site plan for Alternative 2 is provided in Figure V-3 on page V-33.

Since Alternative 2 involves less floor area than the Project, there would be a corresponding reduction in overall construction activity, associated equipment, and the duration of construction, although the peak level of daily activity would be similar to that under the Project. Excavation for Alternative 2 would extend to a maximum estimated depth of 48 feet for subterranean parking and involve approximately 315,000 cy of cut, potentially approximately 9,000 cy of imported fill, and up to approximately 315,000 cy of export. Like the Project, this analysis assumes that buildout may occur in one phase, with completion in 2026, or that a long-term buildout option could be exercised with completion in 2043.[8]

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

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

New construction under Alternative 2 would be limited to an estimated 856,986 square feet in comparison to the 1,626,180 square feet proposed under the Project. Construction of Alternative 2 would also require approximately 61 percent less import/ export of soil during grading activities. Thus, construction of Alternative 2 would require less grading, excavation, and building construction. Due to the overall reduction in grading and building footprint, the duration of such impacts would be reduced. However, the

[8] Only those impacts that could vary with a long-term buildout are specifically addressed in the analysis below.

intensity of air emissions and fugitive dust from grading and construction activities would be similar to the Project on days when maximum construction activities occur. As maximum daily conditions are used for measuring impact significance, regional impacts on these days would be similar to those of the Project and would be significant and unavoidable. As with the Project, Alternative 2 would implement similar mitigation measures (see Mitigation Measures AIR-MM-1 through AIR-MM-4, set forth in Section IV.A, Air Quality, of this Draft EIR) in order to reduce regional NO_X impacts. However, implementation of mitigation measures would not reduce NO_X impacts to a less-than-significant level. Therefore, impacts associated with regional construction emissions under Alternative 2 would remain significant and unavoidable and similar to the impacts of the Project, due to the shorter duration of construction, which would also be significant and unavoidable.

Construction activities under Alternative 2 would be located at similar distances from sensitive receptors as the Project. Since air emissions and fugitive dust from these construction activities would be similar to those of the Project on maximum construction activity days, localized emissions under Alternative 2 would also be similar to those of the Project. Such impacts would be reduced in duration due to the overall reduction in grading and building footprint. Therefore, as with the Project, localized impacts under Alternative 2 would be less than significant with mitigation and similar to the less-than-significant-with-mitigation impacts of the Project.

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 2 would generate diesel particulate emissions associated with heavy equipment operations during construction activities. These activities would represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. Overall, construction emissions generated by Alternative 2 would be less than those of the Project since Alternative 2 would include less development and less overall construction activity. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 2 would be less than significant and less than the Project's less-than-significant impacts.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Similar to the Project, operational regional air pollutant emissions under Alternative 2 would be generated by vehicle trips to the Project Site and the consumption of electricity and natural gas. As discussed in the Transportation Analysis of Project Alternatives for the Television City 2050 Project (Alternatives Traffic Memo) provided in Appendix M of this Draft EIR, development of Alternative 2 would result in an estimated 10,301 daily vehicle trips compared to an estimated 13,454 daily vehicle trips under the Project and a

corresponding 22.6-percent reduction in total daily VMT compared to the Project (an estimated 74,172 total daily VMT under Alternative 2 compared to an estimated 95,865 total daily VMT under the Project).[9] As vehicular emissions depend on the number of trips and VMT, vehicular sources associated with Alternative 2 would result in a corresponding decrease in air emissions compared to the Project. In addition, because the overall square footage would be reduced when compared to the Project, the demand for electricity and natural gas would be less than under the Project. Therefore, impacts associated with regional operational emissions under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.

With regard to on-site localized area source and stationary source emissions, as with the Project, Alternative 2 would not introduce any major new sources of air pollution within the Project Site. Therefore, similar to the Project, localized impacts from on-site emission sources associated with Alternative 2 would also be less than significant. Such impacts would be less than those of the Project due to the overall decrease in net new building square footage. Localized mobile source operational impacts are determined mainly by peak-hour intersection traffic volumes. As discussed above, Alternative 2 would result in a decrease in daily vehicle trips when compared to the Project, which would correspond to a decrease in peak-hour trips. Therefore, localized mobile source impacts would be less than significant and less than the Project's less-than-significant impacts.

(b) Toxic Air Contaminants

As discussed in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include diesel particulate matter from delivery trucks. As this alternative would be smaller than the Project in terms of floor area, the number of delivery trucks would also be reduced in comparison to the Project. Additionally, the types of uses proposed under both the Project and Alternative 2 are not considered land uses that generate substantial TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not proposed under the Project or Alternative 2. Similar to the Project, Alternative 2 would not release substantial amounts of TACs and would be consistent with California Air Resources Board (CARB) and South Coast Air Quality Management District (SCAQMD) guidelines regarding TAC sources in proximity to existing sensitive land uses. Thus, potential TAC impacts under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.

[9] Gibson Transportation Consulting, Inc., Transportation Analysis of Project Alternatives for the Television City 2050 Project, April 2022.

(3) Concurrent Construction and Operation

In the event of a long-term buildout scenario, as with the Project, portions of the Project Site under Alternative 2 could be completed and occupied while completion of construction occurs. The intensity of this interim year air quality impact would remain similar under Alternative 2 since the intensity of construction activity (i.e., the pace at which construction occurs and the equipment used on a daily basis) and the balance of completed and occupied components would be similar. Therefore, concurrent construction and operational regional air quality impacts under Alternative 2 are expected to be significant and unavoidable, but less than the significant and unavoidable impacts of the Project since the overall amount of operations would be reduced under this alternative.

b. Cultural Resources

(1) Historical Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, the Project Site includes the original Primary Studio Complex, which is designated as HCM No. 1167. In addition, several historical resources exist in the surrounding vicinity, including The Original Farmers Market and Rancho La Brea Adobe (6333 West 3rd Street), Chase Bank (312 North Fairfax Avenue), Fairfax Theater (7901–7909 West Beverly Boulevard), and Air Raid Siren No. 25 (near 309 Ogden Drive).

New development under Alternative 2 would consist of a 15-story office building located along Fairfax Avenue and a six-story parking garage located in the northeast corner of the Project Site east of Genesee Avenue. No changes to the HCM would occur, and no new development would be introduced within the Viewshed Restoration Area. As with the Project, buildout under Alternative 2 would alter the immediate surroundings of the Primary Studio Complex by adding new construction to the Project Site and replacing existing buildings and certain expanses of surface parking. The immediate surroundings of the Primary Studio Complex, however, have already been substantially altered since its period of significance (1952-1963), including building expansions, replacement of the front lawn with surface parking, and the introduction of ancillary buildings and structures throughout the Project Site.

These changes over time have altered the immediate on-site surroundings such that the immediate setting no longer contributes to the historic significance or integrity of the Primary Studio Complex. As with the Project, Alternative 2 would involve new construction in areas that have already been altered since the period of significance. Therefore, buildout under Alternative 2 would not materially impair the historic significance and integrity of the Primary Studio Complex. Furthermore, as with the Project, Alternative 2 would not include the demolition, relocation, rehabilitation, alteration, relocation, or

conversion of any historical resources in the vicinity. However, without the Project, the Primary Studio Complex would not be rehabilitated, and the currently compromised character-defining features, as well as the visibility and prominence of the Primary Studio Complex from Beverly Boulevard, would not be restored.

As such, Alternative 2 would result in less than significant impacts with respect to historical resources, and such impacts would be less than the less-than-significant impacts of the Project. However, the Project benefits relating to the HCM would not be achieved.

(2) Archaeological Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, SCCIC records indicate that one historic-period archaeological resource is located south of the Project Site and consists of a brick-lined structure and historic trash scatter dating between the 1910s and 1940s. No archaeological resources have been previously recorded within the Project Site. Alternative 2 would require earthwork activity associated with the subterranean parking, with a maximum excavation depth of approximately 48 feet, compared to the maximum excavation depth of approximately 45 feet for the Project. Alternative 2 would involve approximately 315,000 cy of cut, as compared to the approximately 772,000 cy of cut for the Project. Therefore, like the Project, Alternative 2 has the potential to uncover previously unidentified archaeological resources. However, this potential would be somewhat less than under the Project due to the overall reduction in excavation as a result of the smaller development footprint. Nevertheless, Alternative 2 would comply with the same regulatory requirements and implement the same mitigation measure as the Project (Mitigation Measure CUL-MM-1, set forth in Section IV.B, Cultural Resources, of this Draft EIR) in the event that archaeological resources are uncovered during ground disturbance activities.

As such, the potential to uncover previously unidentified archaeological resources would be less than significant with mitigation under Alternative 2, and, due to the overall reduction in excavation, such impacts would be less than the less-than-significant-with-mitigation impacts of the Project.

c. Energy

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

Similar to the Project, as discussed in Section IV.C, Energy, of this Draft EIR, construction activities associated with Alternative 2 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The

energy consumed would be reduced compared to the Project due to the reduction in the overall amount and duration of construction. Furthermore, as with the Project, construction activities under Alternative 2 would comply with all applicable regulatory requirements relating to energy use. Therefore, like the Project, short-term energy use during construction of Alternative 2 would not occur in a wasteful, inefficient or unnecessary manner, and impacts would be less than significant, similar to the less-than-significant impacts of the Project.

Like the Project, operation of Alternative 2 would generate an increase in the consumption of electricity, natural gas, and petroleum-based fuels compared to existing conditions. Based on the existing solar panels on-site that would remain in place, Alternative 2 would include a solar array capable of producing 1,200,000 kilowatt-hours (kWh) annually, which would represent a reduction of 800,000 kWh/year in comparison to the Project (2,000,000 kW/year) and a reduction of 417,000 kWh/year compared to existing electricity generation on-site (1,617,000 kWh/year). However, Alternative 2 would result in less operational energy demand than the Project due to the reduction in floor area under this alternative. Furthermore, the Los Angeles Department of Water and Power (LADWP) and Southern California Gas Company (SoCalGas) have confirmed that the electrical and natural gas infrastructure in the Project area has adequate capacity to serve the Project; thus, adequate capacity would also be available to serve Alternative 2. In terms of petroleum-based fuel usage, the number of daily trips generated by this alternative would be lower in comparison to the Project due to the reduced floor area; thus, fuel usage would be reduced as well. Lastly, the consumption of electricity, natural gas, and petroleum-based fuels under this alternative would not be wasteful, inefficient, or unnecessary since the development would represent an infill project within an urbanized area that is well served by public transportation, which would contribute to an energy efficient land use pattern consistent with the Southern California Association of Governments' (SCAG) 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) growth forecast. Operation of the proposed uses would comply with applicable energy efficiency standards, and new buildings would be developed to the latest energy efficiency standards. Therefore, like the Project, long-term energy use during operation of Alternative 2 would not occur in a wasteful, inefficient, or unnecessary manner. Impacts would be less than significant and similar to the less-than-significant impacts of the Project.

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

Alternative 2 would result in less operational energy demand than the Project due to the reduced floor area under this alternative. Like the Project, the consumption of electricity, natural gas, and petroleum-based fuels under this alternative would not be wasteful, inefficient, or unnecessary since the proposed uses would comply with applicable energy efficiency standards and the development would represent an infill project within an urbanized area that is well served by public transportation, thus contributing to an energy

efficient land use pattern consistent with SCAG's 2020–2045 RTP/SCS growth forecast. Therefore, like the Project, Alternative 2 would not conflict with plans or policies regarding renewable energy and energy efficiency, and the alternative would result in less than significant impacts, similar to the less-than-significant impacts of the Project.

d. Geology and Soils

(1) Geologic Hazards

The Project Site is located within the seismically active region of Southern California. Thus, under Alternative 2, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, liquefaction, seismically induced settlement, and subsidence, would be similar to those under the Project, particularly since such impacts are a function of a site's underlying geologic conditions rather than the type of land uses or amount of development proposed. As with the Project, Alternative 2 would be subject to all applicable regulations, including the applicable provisions in the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the California Building Code, the City's General Plan Safety Element, and the Los Angeles Building Code. Lastly, similar to the Project, Alternative 2 would not include uses such as mining operations, deep excavations into the earth, or the boring of large areas creating unstable seismic conditions or stresses in the earth's crust. Therefore, as with the Project, Alternative 2 would not cause or accelerate geologic conditions which could result in substantial damage to proposed structures or infrastructure or expose people to substantial risk of injury. Impacts related to geology and soils under Alternative 2 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(2) Paleontological Resources

As discussed in Section IV.D, Geology and Soils, of this Draft EIR, according to a records search of the paleontological specimen and locality records held by the LACM Vertebrate Paleontology Department and the Paleontology Technical Report prepared by Dudek, there are no previously encountered fossil vertebrate localities located within the Project Site. However, localities have been documented elsewhere in the area from the same geologic units that occur beneath portions of the Project Site, and several of these localities are located within approximately 2,000 feet of the Project Site. Alternative 2's earthwork activities associated with subterranean parking would involve a maximum excavation depth of approximately 48 feet, as compared to the maximum excavation depth of approximately 45 feet under the Project. Alternative 2 would also involve approximately 315,000 cy of cut, compared to approximately 772,000 cy of cut for the Project. Therefore, like the Project, Alternative 2 has the potential to uncover previously unidentified paleontological resources. However, this potential would be somewhat less than under the Project due to the overall reduction in excavation and the smaller development footprint.

Nevertheless, Alternative 2 would also comply with the same regulatory requirements and implement the same mitigation measure as the Project (Mitigation Measure GEO-MM-1, set forth in Section IV.D, Geology and Soils, of this Draft EIR) in the event that paleontological resources are uncovered during ground disturbance activities. As such, the potential to uncover previously unidentified paleontological resources would be less than significant with mitigation, and, due to the overall reduction in excavation, such impacts would be less than the less-than-significant-with-mitigation impacts of the Project.

e. Greenhouse Gas Emissions

(1) Construction

Under Alternative 2, the overall amount of new construction would be reduced in comparison to the Project (i.e., an estimated 856,986 square feet under Alternative 2 versus 1,626,180 square feet under the Project). The mix of equipment and emissions factors would be the same under Alternative 2, but overall equipment requirements and haul/delivery truck trips would be less under this alternative. As a result, GHG emissions over the construction duration under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.

(2) Operation

As discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, GHG emissions from a development project are determined in large part by the number of daily trips generated and the energy consumption associated with the proposed land uses. As discussed above, Alternative 2 would include less development, consume less energy, and generate fewer daily vehicle trips than the Project. Thus, the amount of GHG emissions generated by Alternative 2 would be less than the Project. As with the Project, Alternative 2 would be designed to comply with the City's Green Building Ordinance, as applicable, and would incorporate sustainability features similar to those set forth in Project Design Features GHG-PDF-1 and GHG-PDF-2 to reduce GHG emissions. Furthermore, as with the Project, Alternative 2 would represent infill development within an urban area that is well served by public transportation and, thus, would contribute to an energy efficient land use pattern which would support the goals of the RTP/SCS intended to reduce GHG emissions. Lastly, based on the existing solar panels on-site that would remain in place, Alternative 2 would include a solar array capable of producing 1,200,000 kWh/year, which would represent a reduction of 800,000 kWh/year in comparison to the Project (2,000,000 kW/year). Therefore, Alternative 2, like the Project, would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.

f. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, hazardous materials, such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, would be used and, therefore, would require proper handling, management, and, in some cases, disposal. The management of any hazardous wastes could increase the opportunity for hazardous materials releases and, subsequently, the exposure of the public to hazardous materials. However, as discussed for the Project in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, all potentially hazardous materials under Alternative 2 would be used, stored, and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use.

With respect to existing conditions, as discussed in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, the Project Site is identified in multiple databases compiled pursuant to Government Code Section 65962.5. These listings collectively constitute a Recognized Environmental Condition (REC) and a Controlled Recognized Environmental Condition (CREC). In addition, like the Project, Alternative 2 would have the potential to encounter contaminated soils, soil gas, and impacted groundwater during construction. However, such potential would be reduced as compared to that of the Project due to the reduced development footprint and excavation activities under this alternative. Specifically, Alternative 2 would involve approximately 315,000 cy of cut with a maximum excavation depth of approximately 48 feet, compared to approximately 772,000 cy of cut and a maximum excavation depth of approximately 45 feet for the Project. Furthermore, Alternative 2 is estimated to require the removal of approximately 45,000 cy of contaminated soil as compared to approximately 60,000 cy under the Project. As with the Project, any contaminated soils, soil gas, or impacted soil and groundwater encountered would be treated and disposed of in accordance with applicable regulations and mitigation measures (Mitigation Measures HAZ-MM-1 and HAZ-MM-2, set forth in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR) to reduce potential impacts to less-than-significant levels. Similar to the Project, mitigation would include a soil management plan and subsurface gas controls.

Lastly, Alternative 2 would not involve any building demolition and, therefore, would not include the removal of existing buildings that could potentially contain asbestos-containing materials (ACM) or lead-based paint (LBP). Overall, similar to the Project, the impacts under Alternative 2 would be less than significant with mitigation, and such impacts would be less than the Project's less-than-significant-with-mitigation impacts.

(2) Operation

Operation of Alternative 2 would involve the use of limited quantities of potentially hazardous materials typical of those used in studio campuses, including paints, stains, adhesives, solvents, and other materials used in set design and fabrication, fuels, pesticides for landscaping, cleaning and maintenance supplies, materials for pyrotechnic special effects, and other general products related to studio operations. Like the Project, as discussed in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, all hazardous materials on the Project Site under Alternative 2 would be acquired, handled, used, stored, and disposed of in accordance with all applicable federal, state and local requirements. Project Design Features HAZ-PDF-1 through HAZ-PDF-6, set forth in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR calling for safety and emergency plans and training would be implemented, similar to the Project, and all necessary permits for filming activities and related operations would be obtained, as required. Such safety and emergency plans and training would include the Consolidated Contingency Plan, the Television Studios Emergency Action Plan, the Television Studios Safety Manual, and the Television Studios Injury and Illness Prevention Program. Additionally, like the Project, the Alternative 2 driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding Project Site access, thus providing adequate emergency access. Overall, impacts would be less than significant, and such impacts would be slightly less than the less-than-significant impacts of the Project as a result of a reduced level of development.

g. Hydrology and Water Quality

(1) Surface Water Hydrology

(a) Construction

Similar to the Project, construction activities for Alternative 2 would include the removal of some surface parking areas and new building construction. Alternative 2 would require less excavation overall and less building construction compared to the Project. Alternative 2 would also disturb less surface area than the Project. Notwithstanding, as with the Project, these activities would have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Also similar to the Project, Alternative 2 would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. In accordance with the requirements of this permit, Alternative 2 would implement a Stormwater Pollution Prevention Plan (SWPPP) that specifies best management practices (BMPs) and erosion control measures to be used during construction to manage runoff flows and prevent pollution. In addition, Alternative 2 would be required to comply with all applicable City grading permit regulations which establish the measures, plans, and inspections necessary

to reduce sedimentation and erosion, similar to the Project. Thus, through compliance with all NPDES Construction General Permit requirements, including the preparation of a SWPPP, implementation of BMPs, and compliance with applicable City grading regulations, Alternative 2 would not alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, or flooding on- or off-site. Similarly, with adherence to standard compliance measures, construction activities would not cause flooding, substantially increase or decrease the amount of surface water flow from the Project Site into a water body, or result in a permanent, adverse change to the movement of surface water. Therefore, construction-related impacts to surface water hydrology under Alternative 2 would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project due to the reduction in the development footprint.

(b) Operation

As with the Project, Alternative 2 would include the development of new buildings, paved areas, and landscaped areas. As with the Project, implementation of Alternative 2 would continue to be comprised of up to approximately 90 percent impervious surfaces upon buildout. Accordingly, there would be no increase in runoff volumes into the existing storm drain system. Furthermore, as with the Project, Alternative 2's stormwater infrastructure would be designed to convey the 50-year storm to the designated discharge location. Inlets within the Project Site would be sized to eliminate the potential for ponding. Accordingly, drainage within the Project Site during operation of Alternative 2 would be similar to current conditions.

Based on the above, Alternative 2 would not impact the existing storm drain infrastructure serving the Project Site, and runoff would continue to follow the same discharge paths and drain to the same storm systems. Consequently, Alternative 2 would not cause flooding during a 50-year storm event, would not create runoff that would exceed the capacity of existing or planned drainage systems, would not require construction of new stormwater drainage facilities or expansion of existing facilities, would not substantially reduce or increase the amount of surface water in a water body, or result in a permanent adverse change to the movement of surface water. Therefore, operational impacts to surface water hydrology under Alternative 2 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(2) Surface Water Quality

(a) Construction

Under Alternative 2, the degree to which new pollutants could be introduced to the Project Site during construction would be reduced compared to the Project since Alternative 2 would involve less construction that would occur over a shorter duration. As with the Project, a SWPPP would be prepared for Alternative 2 and would specify BMPs to

be used during construction. While excavation activities under Alternative 2 would be reduced overall, Alternative 2 would require a maximum excavation depth of approximately 48 feet as compared to the maximum excavation depth of approximately 45 feet for the Project. Accordingly, Alternative 2 could require a temporary dewatering system during construction, similar to the Project.

With the implementation of site-specific BMPs included as part of the SWPPP, Alternative 2 would reduce or eliminate the discharge of potential pollutants from stormwater runoff. In addition, construction of Alternative 2 would be required to comply with City grading permit regulations, which establish the measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspections necessary to reduce sedimentation and erosion. With compliance with NPDES requirements and City grading permit regulations, construction of Alternative 2 would not result in discharges that violate any water quality standard or waste discharge requirements or otherwise substantially degrade water quality. Furthermore, construction of Alternative 2 would not result in discharges that would cause regulatory standards to be violated in the Ballona Creek Watershed. Therefore, as with the Project, construction-related impacts to surface water quality under Alternative 2 would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project due to the reduction in excavation and overall construction activities.

(b) Operation

As is typical of most urban developments, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. Like the Project, potential pollutants generated by Alternative 2 would include sediment, nutrients, pesticides, metals, pathogens, and oil and grease, similar to existing conditions. Also similar to the Project, Alternative 2 would implement BMPs for managing stormwater runoff in accordance with the City's Low Impact Development (LID) Ordinance requirements. The BMPs would control stormwater runoff such that no increase in runoff volumes over existing conditions would result from the alternative. As with the Project, Alternative 2 would include a capture and use system (or other biofiltration/bioretention system) for irrigation purposes, consistent with LID requirements, to reduce the quantity and improve the quality of rainfall runoff from the Project Site. With the incorporation of the LID BMPs, operation of Alternative 2 would not result in discharges that would violate any water quality standard or waste discharge requirements or otherwise substantially degrade water quality. Thus, as with the Project, impacts to surface water quality during operation of Alternative 2 would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project due to the reduction in development and associated operational activities.

(3) Groundwater Hydrology

(a) Construction

As previously discussed, like the Project, Alternative 2 could require a temporary dewatering system during construction, which would be installed and operated in accordance with NPDES General Construction Permit requirements. Any discharge of groundwater during construction of Alternative 2 would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements. As discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, no water supply wells are located at the Project Site or within 1 mile of the Project Site that could be impacted by construction. In addition, as with the Project, Alternative 2 would not include the construction of water supply wells. Therefore, construction impacts on groundwater hydrology associated with Alternative 2 would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project due to the overall reduction in excavation and construction activities.

(b) Operation

As with the Project, the subterranean parking proposed under Alternative 2 would be designed to withstand hydrostatic forces and would incorporate comprehensive waterproofing systems in accordance with industry standards and construction methods. As such, similar to the Project, permanent dewatering operations are not expected during operation of Alternative 2. As discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, the Project Site is currently 90 percent impervious, and, as such, minimal groundwater recharge occurs. Similar to the Project, Alternative 2 would continue to be comprised of up to approximately 90 percent impervious surfaces following buildout. Therefore, impacts to groundwater hydrology during operation of Alternative 2 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(4) Groundwater Quality

(a) Construction

Similar to the Project, Alternative 2 could require dewatering during construction, which would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements. Pursuant to such requirements, any extracted groundwater would be chemically analyzed to determine the appropriate treatment and/or disposal methods.

During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would, therefore, require

proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials to be released into groundwater. As this alternative would require less construction activities for a shorter duration when compared to the Project, the use of hazardous materials would be reduced.

In addition, like the Project, Alternative 2 would have the potential to encounter contaminated soils, soil gas, and impacted soil and groundwater during construction. However, as previously discussed, associated hazards would be reduced as compared to the Project due to the reduced excavation activities under this alternative. Specifically, Alternative 2 is estimated to require the removal of approximately 45,000 cy of contaminated soil as compared to approximately 60,000 cy under the Project. Furthermore, Alternative 2 would implement similar mitigation measures (Mitigation Measures HAZ-MM-1 and HAZ-MM-2, set forth in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR) as the Project, including a soil management plan and subsurface gas controls, to ensure that potential impacts related to the exposure or release of subsurface gases and impacted soil and groundwater are less than significant. In addition, compliance with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous waste would reduce the potential for the construction of Alternative 2 to release contaminants into groundwater that could affect the rate or direction of movement of existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well downstream. Lastly, as there are no groundwater production wells or public water supply wells on-site or within 1 mile of the Project Site, construction activities would not affect existing wells.

Based on the above, impacts with respect to groundwater quality during construction under Alternative 2 would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project due to a reduction in excavation and overall construction activities and a shorter construction duration.

(b) Operation

Operational activities that could affect groundwater quality include spills of hazardous materials. In accordance with City requirements, source control measures, including good housekeeping, removal of trash and maintenance of driveways and parking areas, and proper use and storage of pesticides, would reduce water quality impacts and prevent pollutants from entering the groundwater by percolation within landscaped areas or other permeable surfaces. In addition, Alternative 2 is not anticipated to result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise reach groundwater through percolation. Furthermore, there are currently no USTs within the Project Site, and no new USTs would be installed as part of the alternative. Therefore, impacts with respect to groundwater quality during operation of

Alternative 2 would be less than significant, and such impacts would be slightly less than the less-than-significant impacts of the Project due to the reduction in floor area and associated use of hazardous materials.

h. Land Use and Planning

Alternative 2, the Development in Accordance with Existing Zoning Alternative, considers development of the Project Site in accordance with the existing zoning and land use regulations for the Project Site, which 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) and designated as Community Commercial, Neighborhood Commercial, and Limited Commercial per the Community Plan. The unincorporated County parcel, which would be annexed to the City, is zoned C-MJ (Major Commercial) and designated Major Commercial per the Los Angeles County 2035 General Plan. The C2 and C1.5 zones permit a variety of commercial land uses, including broadcasting studios, offices, and retail uses, and an FAR of up to 1.5:1. This alternative would not include a Specific Plan or Sign District and thus would not involve a General Plan Amendment or Zone Change. Based on the existing zoning and land use designations of the Project Site, the studio-related uses contemplated as part of Alternative 2 are permitted by-right and would be compatible with both the existing uses on-site and those in the surrounding area. In addition, similar to the Project, this alternative would not conflict with applicable plans, policies, and regulations that were adopted for the purpose of avoiding or mitigating an environmental effect, including, but not limited to, the City's General Plan Framework Element, Wilshire Community Plan, Los Angeles Municipal Code (LAMC), and SCAG's 2020–2045 RTP/SCS. However, without a Specific Plan to establish a clear and cohesive development framework for the Project Site, Alternative 2 would not include site-specific standards for development planning, building heights, frontage areas and design, nor result in the same visual and physical integration of the proposed land uses as the Project. Nonetheless, the impacts of Alternative 2 related to potential conflicts with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

i. Noise

(1) Noise

(a) Construction

The types of construction activities and associated equipment under Alternative 2 would be substantially similar to the Project, although the amount of new construction activities and duration would be reduced due to the reduction in total floor area under Alternative 2. As with the Project, construction of Alternative 2 would generate noise from

the use of heavy-duty construction equipment, as well as from haul truck and construction worker trips. Under Alternative 2, on- and off-site construction activities and the associated construction noise levels would be similar to those of the Project on maximum activity days since the daily intensity of construction activities would be similar to the Project, although the number of days with maximum activity would be reduced due to the overall reduction in building footprint and associated construction activities. As such, noise levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Additionally, Alternative 2 would implement similar Project design features and mitigation measure (Project Design Features NOI-PDF-1 through NOI-PDF-5 and Mitigation Measure NOI-MM-1, set forth in Section IV.I, Noise, of this Draft EIR) as the Project, which would minimize construction noise. Nonetheless, on- and off-site construction noise impacts (both Project-level and cumulative) would be significant and unavoidable under Alternative 2, and such impacts would be the same as the Project's significant and unavoidable impacts since noise levels on maximum activity days would be similar.

(b) Operation

As discussed in Section IV.I, Noise, of this Draft EIR, for the Project, sources of operational noise would include on-site stationary noise sources, including mechanical equipment, activities within outdoor spaces (i.e., outdoor roof decks and outdoor studio production activities), parking facilities, loading docks, and trash compactors; and off-site mobile (roadway traffic) noise sources. Alternative 2 would introduce similar noise sources as the Project. However, it is anticipated that with the overall reduction in total floor area under this alternative, the noise levels from building mechanical equipment, use of outdoor spaces, and parking facilities would be reduced. Alternative 2 would implement design features similar to Project Design Feature NOI-PDF-3 (acoustic screening of mechanical equipment), Project Design Feature NOI-PDF-4 (controls on amplified sound), and Project Design Feature NOI-PDF-5 (limits on outdoor studio production within 200 feet of the Shared Eastern Property Line), which would minimize on-site operational noise. As a result, operational on-site noise impacts under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

With regard to operational off-site (traffic) noise, Alternative 2 would generate less operational traffic than the Project due to the reduction in floor area. The reduction in vehicle trips would result in a decrease in off-site operational traffic-related noise levels under Alternative 2. Therefore, off-site noise impacts under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

As noted above, the types of construction activities and associated equipment under Alternative 2 would be similar to the Project's, although the amount and duration of construction activities would be reduced. The on- and off-site vibration levels during construction would be expected to be similar to those of the Project as construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment. As such, peak vibration levels generated by construction equipment and construction truck trips under Alternative 2 would be similar to those of the Project. Accordingly, although the duration of such impacts would be reduced due to the reduced building footprint, construction activities under Alternative 2 would result in the same significant and unavoidable on- and off-site vibration impacts based on the significance threshold for human annoyance and less-than-significant on- and off-site vibration impacts based on the significance threshold for building damage as the Project.

(b) Operation

As described in Section IV.I, Noise, of this Draft EIR, sources of vibration related to Project operations would include vehicle circulation, delivery trucks, and building mechanical equipment. These same sources of operational vibration would occur under Alternative 2. As with the Project, vehicular-induced vibration from Alternative 2, including vehicle circulation within the subterranean parking areas, would not generate perceptible vibration levels at off-site sensitive uses. In addition, like the Project, building mechanical equipment installed as part of Alternative 2 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include vibration-attenuation mounts to reduce vibration transmission such that the vibration would not be perceptible at any off-site sensitive receptors. Therefore, as with the Project, operation of Alternative 2 would not increase vibration levels in the immediate vicinity of the Project Site. As such, vibration impacts associated with operation of Alternative 2 would also be less than significant. Such impacts would be less than the less-than-significant impacts of the Project due to the reduction in vehicle trips and floor area under this alternative.

j. Public Services

(1) Fire Protection

(a) Construction

The types of construction activities required for Alternative 2 would be similar to those of the Project, although the overall amount of development, associated construction

activities and construction traffic, and the duration of construction would be reduced due to the reduced floor area and excavation. Like the Project, construction under Alternative 2 would occur in compliance with all applicable federal, state, and local requirements concerning fire prevention and hazardous materials, which would effectively reduce the potential for construction-related fire and explosion. Additionally, similar to the Project, Alternative 2 would maintain travel lanes on all streets around the Project Site throughout the construction period and implement a Construction Traffic Management Plan, which would include provisions for maintaining emergency access during construction. Furthermore, emergency vehicles have the ability to avoid traffic delays through the use of sirens to clear paths of travel in accordance with the California Vehicle Code (CVC). Therefore, construction of Alternative 2, like the Project, would not result in the need for new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 2 would be less than significant, and such impacts would be slightly less than the less-than-significant impacts of the Project due to the reduction in construction activity.

(b) Operation

Alternative 2 would involve less floor area and associated employment generation than the Project and thus would generate a smaller demand for LAFD fire protection services on a daily basis. Similar to the Project, Alternative 2 would comply with all applicable City Building Code and Fire Code requirements regarding structural design, building materials, Project Site access, fire flow, storage and management of hazardous materials including pyrotechnical supplies, alarm and communications systems, and life safety features (e.g., automatic fire sprinkler systems, fire service access elevators, etc.) and would undergo LAFD fire/life safety plan review, which would reduce the demand for fire protection and emergency medical services and also ensure adequate emergency access. Furthermore, as with the Project, traffic generated by Alternative 2 would not significantly impact emergency vehicle response to the Project Site and surrounding area as the drivers of emergency vehicles have the ability to bypass traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Alternative 2 would be expected to have the same or lower fire flow requirement as the Project, and, thus, LADWP would be able to supply sufficient flow and pressure to satisfy the fire suppression needs. Furthermore, the existing helipad on-site would be retained and would continue to operate as part of Alternative 2, similar to the Project.

Therefore, like the Project, this alternative would not necessitate the construction of new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. As such, impacts with regard to fire protection services during operation of Alternative 2 would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project due to the reduction in development and associated service population.

(2) Police Protection

(a) Construction

As discussed above, the types of construction activities under Alternative 2 would be similar to those of the Project; however, the overall amount of development, associated construction activities and construction traffic, and the duration of construction would be reduced compared to the Project due to the reduced floor area and excavation. Similar to the Project, construction activities would not generate a permanent population on the Project Site that would substantially increase the police service population of LAPD's Wilshire Community Police Station. In addition, the Project Site perimeter would remain enclosed with walls or fencing, and access would continue to be controlled via staffed guard houses. Therefore, as with the Project, construction of Alternative 2 would not contribute to a temporary increased demand for police protection services. With continued implementation of existing security measures, the potential demand on police protection services at the Project Site associated with theft and vandalism during construction would be reduced.

Like the Project, Alternative 2 would implement a Construction Traffic Management Plan to ensure the continued provision of emergency access during construction. Additionally, pursuant to CVC Section 21806, emergency vehicles can use their sirens to clear a path of travel or drive in the lanes of opposing traffic during an emergency to avoid traffic. Therefore, similar to the Project, construction of Alternative 2 would not result in the need for new or altered government facilities (i.e., police stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 2 would be less than significant, and such impacts would be slightly less than the less-than-significant impacts of the Project due to the reduction in construction activity.

(b) Operation

Like the Project, Alternative 2 would not include any residential uses and, thus, would not increase the service population of the Wilshire Community Police Station or impact the officer-to-population ratio within the Wilshire Division. Alternative 2 would implement similar security features as the Project, such as a 24-hour/seven-day security plan, sufficient lighting, and a secured perimeter, which would reduce the demand for police services, and, like the Project, Alternative 2 would generate General Fund tax revenues for the City that could be used to expand law enforcement resources in the Wilshire Division. Therefore, as with the Project, Alternative 2 would not result in the need for new or altered government facilities (i.e., police stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 2 would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project due to the reduced population.

k. Transportation

Transportation impacts associated with Alternative 2 are addressed in the Alternatives Traffic Memo provided in Appendix P of this Draft EIR. As discussed therein, the transportation-related plans, policies, and programs applicable to the Project would also apply to Alternative 2. As with the Project, this alternative would not interfere with the complete streets balanced transportation network (i.e., Transit-Enhanced Network, Bicycle Enhanced Network, and Pedestrian-Enhanced Districts) concept of the Mobility Plan and would enhance pedestrian access within and around the Project Site as called for by the Mobility Plan and the Wilshire Community Plan. The alternative would also prioritize safety and access for all individuals utilizing the Project Site by complying with all American with Disabilities Act (ADA) requirements as required by the LAMC; include sidewalk and driveway design, vehicular parking, bicycle parking, etc., in accordance with LAMC requirements; and represent urban infill development within a Transit Priority Area (TPA) and High Quality Transit Area (HQTA) in close proximity to transit, which would encourage alternative transportation use as called for by the Mobility Plan and 2020–2045 RTP/SCS. Alternative 2 would support these transportation plans for the same reasons as the Project and would include a Mobility Hub, similar roadway and sidewalk improvements, sufficient parking, etc. Alternative 2 would also implement a Transportation Demand Management (TDM) Program to reduce VMT, as called for by the Mobility Plan, Wilshire Community Plan, 2020–2045 RTP/SCS, and the City's TDM Ordinance.

Furthermore, as discussed in Section IV.K, Transportation, of this Draft EIR, Fairfax Avenue and Beverly Boulevard adjacent to the Project Site and West 3rd Street to the south are identified as part of the Vision Zero's High Injury Network. As with the Project, it is assumed Alternative 2 would include certain off-site Vision Zero safety improvements, including bus stop improvements along the Project Site perimeter along Fairfax Avenue and Beverly Boulevard, which would include adequate benches, shelters, lighting, LED displays, and signage to the extent feasible under the City of Los Angeles' current bus shelter contract; and a financial contribution toward the funding of pedestrian facilities and safety improvements within area. The alternative's improvements to the pedestrian environment would not preclude future Vision Zero safety improvements by the City. Additionally, as with the Project, the Project Applicant would contribute to signal improvements at nearby intersections, as required by the Los Angeles Department of Transportation (LADOT).

Therefore, as with the Project, Alternative 2 would not conflict with any applicable program, plan, ordinance, or policy addressing the circulation system. Impacts would be less than significant and similar to the less-than-significant impacts of the Project.

With respect to VMT, Alternative 2 would generate a lower total work VMT but a higher work VMT per employee than the Project. Specifically, Alternative 2 would generate

an estimated 43,307 daily work VMT and an average work VMT per employee of 7.3, which would be below the work VMT per employee significance threshold of 7.6 for the Central Area Planning Commission (APC). Therefore, as with the Project, Alternative 2 would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b), regarding VMT, and impacts would be less than significant. Overall, Alternative 2 would have a lesser VMT impact than the Project because it would generate an estimated 74,172 total VMT compared to an estimated 95,865 total VMT for the Project. Regarding freeway safety, as discussed in the Alternatives Traffic Memo, Alternative 2 would not add 50 feet or more to queues on the US-101 southbound off-ramp at Highland Avenue during either peak hour and, thus, would not exceed the ramp storage length. Specifically, Alternative 2 would generate an estimated 49 morning peak-hour trips and 10 afternoon peak-hour trips on the US-101 southbound off-ramp at Highland Avenue, as compared to the Project's 42 morning peak-hour trips and 16 afternoon peak-hour trips on the off-ramp. Therefore, like the Project, Alternative 2 would neither be subject to speed differential analyses nor cause a significant freeway safety impact. Impacts related to freeway safety would be less than significant, and such impacts would be roughly equivalent than the less-than-significant impacts of the Project.

I. Tribal Cultural Resources

As previously discussed, Alternative 2 would require excavations associated with subterranean parking to a maximum depth of approximately 48 feet as compared to the maximum excavation depth of approximately 45 feet for the Project. Additionally, Alternative 2 would involve approximately 315,000 cy of cut, compared to approximately 772,000 cy of cut for the Project. Therefore, like the Project, Alternative 2 has the potential to uncover previously unidentified tribal cultural resources. However, this potential would be somewhat less than under the Project due to the overall reduction in excavation and the smaller development footprint. As discussed in Section IV.L, Tribal Cultural Resources, of this Draft EIR, no tribal cultural resources have been previously recorded at the Project Site. Nonetheless, Alternative 2 would implement the City's standard Condition of Approval for the inadvertent discovery of tribal cultural resources, which would ensure that any impacts to tribal cultural resources that may be encountered during construction would remain less than significant. Therefore, impacts under Alternative 2 related to tribal cultural resources would be less than significant, and, due to the overall reduction in excavation, such impacts would be less than the less-than-significant impacts of the Project.

m. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities for Alternative 2 would result in a temporary water demand for dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. Construction-related water use under Alternative 2 would be less than the Project's due to the overall reduced amount of grading and excavation activities as a result of the smaller development footprint. Furthermore, while Alternative 2 would require trenching for connection to the existing water mains in the adjacent streets similar to the Project, Alternative 2 would similarly implement a Construction Traffic Management Plan to ensure the safe and efficient flow of pedestrian and vehicular traffic around the Project Site during construction. As such, like the Project, Alternative 2 would not result in construction activities that require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental impacts. Impacts related to water supply and infrastructure during construction of Alternative 2 would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project.

(b) Operation

As with the Project, Alternative 2 would result in an increase in long-term water demand. However, based on the reduction in total development as compared to the Project, water demand for Alternative 2 would be less than the Project's estimated increase in water demand. Specifically, the water demand for Alternative 2 would be an estimated 232,654 gallons per day (gpd), as compared to the Project's estimated water demand of 313,176 gpd under the proposed development program.[10]

Thus, as with the Project, the estimated water demand under Alternative 2 could be met by LADWP's projected water supplies, including in normal, single-dry, and multi-dry years through the year 2045. In addition, the existing water distribution infrastructure would be adequate to serve Alternative 2 since the water demand would be less than under the Project. Furthermore, similar to the Project, Alternative 2 would implement any necessary on-site infrastructure and connections to the LADWP water system pursuant to applicable City requirements. Therefore, impacts under Alternative 2 related to water supply and infrastructure during operation would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project.

[10] The Project could generate a maximum estimated water demand of 313,785 gpd under the proposed land use exchange program.

(2) Wastewater

(a) Construction

Limited wastewater generation may occur incrementally throughout construction of Alternative 2, and wastewater flows would be less than the Project's due to the overall reduction in development. Furthermore, such flows would be temporary and could be accommodated by existing infrastructure. In addition, construction workers would typically utilize portable restrooms, which would not contribute directly to the wastewater system that serves the Project Site but would eventually be treated at the Hyperion Wastewater Reclamation Plant (HWRP), which has ample available capacity. As with the Project, new sewer line connections would be required to connect the proposed buildings to the main sewer infrastructure system in the streets surrounding the Project Site. Construction impacts associated with new connections would primarily be confined to trenching for the placement of pipe and connection into the existing main sewer lines, and any off-site work that could potentially affect existing sewer service to adjacent properties would be coordinated with the City's Bureau of Engineering (BOE). As such, Alternative 2, like the Project, would not require or result in the relocation or construction of new or expanded wastewater facilities, the construction or relocation of which could cause significant environmental effects during the construction period. Therefore, similar to the Project, impacts under Alternative 2 related to wastewater during construction would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 2 would increase wastewater flows from the Project Site. However, based on the relative reduction in total floor area, operational wastewater generation under Alternative 2 would be less than under the Project. Specifically, wastewater generation for Alternative 2 is estimated to be 230,134 gpd, as compared to the Project's estimated wastewater generation of 261,785 gpd under the proposed development program.[11]

As provided in Section IV.M.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the wastewater generated during Project operation could be accommodated by the existing remaining capacity of the HWRP. As operational wastewater generation under Alternative 2 would be less than under the Project, the HWRP would have adequate capacity to serve Alternative 2.

[11] The Project could generate maximum estimated wastewater flows of 262,160 gpd under the proposed land use exchange program.

Regarding wastewater conveyance (sewer) capacity, as discussed in Section IV.M.2, Utilities and Service Systems—Wastewater, of this Draft EIR, sewer service for the Project would be provided utilizing new or existing on-site sewer connections to the existing off-site sewer lines in the adjacent streets. According to the TVC 2050 Project—Utility Infrastructure Technical Report: Water, Wastewater and Energy (Utility Report) included as Appendix O of this Draft EIR, the sewer lines serving the Project Site have adequate capacity to serve the Project.[12] Since Alternative 2 would generate reduced wastewater flows compared to the Project, the local sewer lines would have adequate capacity to serve Alternative 2. Further, as with the Project, detailed gauging and evaluation would be conducted for Alternative 2, as required by LAMC Section 64.14, to obtain final approval of a sewer capacity and connection permit during the permitting process. Finally, as with the Project, all sanitary sewer connections and on-site infrastructure under Alternative 2 would be designed and constructed in accordance with applicable regulatory standards.

Based on the above, operation of Alternative 2, as with the Project, would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. Therefore, impacts under Alternative 2 related to wastewater during operation would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project.

(3) Electric Power, Natural Gas, and Telecommunications Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 2 would consume minor quantities of electricity (construction activities do not typically involve the consumption of natural gas or use of hard-wired telecommunications facilities). The energy consumed during construction of Alternative 2 would be less than under the Project due to the reduction in new development and associated construction activities and the shorter duration of construction. Furthermore, because the Project Site is an urban infill site that is already served by energy infrastructure, similar to the Project, it is anticipated that Alternative 2 would not require the construction of off-site energy infrastructure improvements. Lastly, like the Project, Alternative 2 would be required to coordinate energy infrastructure improvements with LADWP and SoCalGas and develop on-site energy infrastructure and connections to the existing off-site energy infrastructure in accordance with applicable regulatory requirements. Hence, like the Project, construction activities

[12] KPFF Consulting Engineers, TVC 2050 Project—Utility Infrastructure Technical Report: Water, Wastewater and Energy, March 2022.

under Alternative 2 would not result in an increase in energy demand that exceeds available distribution infrastructure capabilities that would require the construction of new or expanded energy facilities, the construction of which could cause significant environmental effects. Therefore, impacts on energy infrastructure associated with short-term construction activities under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project due to the reduction in development and shorter duration of construction activities.

(b) Operation

As with the Project, operation of Alternative 2 would increase the demand for electricity, natural gas, and telecommunications relative to existing conditions. However, Alternative 2 operations would result in less demand than the Project due to the reduction in new development. Hence, Alternative 2 would result in reduced operational impacts affecting energy and telecommunications infrastructure when compared to the Project. Also, as discussed in the Utility Report, LADWP and SoCalGas have confirmed that the existing energy infrastructure in the area is sufficient to serve the Project. Because Alternative 2 would result in less operational energy demand than the Project, the existing energy infrastructure in the area would also be adequate to serve Alternative 2. Similarly, private telecommunications providers would be expected to expand service capacities as needed to meet demand. Therefore, as with the Project, Alternative 2 operation would not result in an increase in energy or telecommunications demand that exceeds available distribution infrastructure capabilities that would require the construction of new or expanded facilities, the construction of which could cause significant environmental effects. Impacts on energy and telecommunications infrastructure under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project. However, as this alternative would involve less solar energy generating capacity than the Project (and less than under existing conditions), the Project's benefit would not be achieved.

3. Comparison of Impacts

Alternative 2 would not avoid or substantially reduce the Project's significant and unavoidable impacts with respect to Project-level and cumulative regional construction emissions; regional emissions associated with concurrent construction and operations; Project-level and cumulative on- and off-site noise during construction; and Project-level on-site vibration and Project-level and cumulative off-site vibration (related to the significance threshold for human annoyance) during construction. These impacts would continue to be significant and unavoidable under Alternative 2, although the duration of such impacts would be reduced due to the overall reduction in building footprint and associated construction activities.

Additionally, Alternative 2 would reduce several of the less-than-significant-with-mitigation impacts associated with the Project, specifically with respect to archaeological resources; paleontological resources; and hazards and hazardous materials during construction. Alternative 2 would also result in similar less-than-significant-with-mitigation impacts as the Project with regard to localized construction-related emissions.

Likewise, Alternative 2 would reduce several of the less-than-significant impacts associated with the Project, specifically with respect to regional and localized operational emissions; TACs during construction and operation; historical resources; GHG emissions; hazards and hazardous materials during operation; surface water hydrology during construction; surface water quality; groundwater hydrology during construction; groundwater quality; land use and planning; on- and off-site operational noise; on- and off-site operational vibration (related to the significance threshold for building damage); fire protection; police protection; VMT; tribal cultural resources; water supply and infrastructure; wastewater; and energy and telecommunications infrastructure.

Lastly, Alternative 2 would result in similar less-than-significant impacts as the Project with regard to energy efficiency; geologic hazards; surface water quality and groundwater hydrology during operations; on- and off-site construction-related vibration pursuant to the significance threshold for building damage; freeway safety; and consistency with transportation plans, programs, and policies.

4. Relationship of the Alternative to Project Objectives

Alternative 2 would develop the Project Site in accordance with the existing zoning and land use regulations for the Project Site. As discussed above, Alternative 2 assumes the construction of 856,986 square feet of new general office uses and the retention of 743,680 square feet of existing development. Alternative 2 would also include a Mobility Hub and the same frontage areas, building stepbacks, general landscape plan, and streetscape improvements as the Project. While the amount of development under this alternative would be less than under the Project, Alternative 2 would still generally meet the underlying purpose of the Project, which is to maintain Television City as a production use and to modernize and enhance production facilities within the Project Site to meet both the existing unmet and anticipated future demands of the entertainment industry, keep production activities and jobs in Los Angeles, upgrade utility and technology infrastructure, and create a cohesive studio lot. However, Alternative 2 would be less effective than the Project in meeting this purpose as a result of the reduced amount of development under this alternative, which would reduce on-site synergies and production capacity.

Regarding the Project objectives, Alternative 2 would meet the following Project objective generally as effectively as the Project:

- Provide multi-modal transportation solutions, including a Project Mobility Hub, to connect TVC employees and guests with surrounding public transit lines, employee shuttles, and a rideshare program, to encourage alternative means of transportation, and focus growth in a high-density, jobs-rich area in close proximity to transit.

Alternative 2 would partially meet the following Project objectives or would not meet the objectives as well as the Project, due to the reduced amount of development under this alternative:

- Promote local and regional economic growth by creating a wide range of entertainment jobs as well as construction jobs and keeping production jobs in Los Angeles.

- Contribute to Los Angeles' status as a global creative capital and provide maximum opportunity for productions to be filmed in the region through the continued use and expansion of the Project Site as a major studio and entertainment institution, in conformance with the goals and objectives of applicable local and regional plans and policies.

- Provide adequate, safe, and efficient ingress/egress, circulation, staging, and parking that satisfies the unique demands of a large-scale production studio with direct, enhanced access to the uses on-site and sufficient truck and trailer circulation areas, in compliance with modern fire and life safety requirements.

- Permit a reasonable, risk-adjusted return on investment commensurate with the Project Applicant's fiduciary responsibilities and allow for sustained economic viability and growth in an evolving entertainment market, while generating tax and property revenues to the City.

- Create multiple production basecamps to allow for the flexible and efficient staging of vehicles needed for film and television productions.

- Create a model for environmental sustainability in modern production studio operations by implementing best management practices regarding water, energy, and resource conservation.

Alternative 2 would not meet the following objectives, due to the nature of the alternative and the location of proposed development under this alternative's conceptual layout:

- Create a fully integrated and cohesive master planned site regulated by a Specific Plan that retains the Project Site's land use as a studio facility and provides an expandable, flexible, and operationally seamless production ecosystem that is able to respond to evolving market demands, support content creation, and maximize studio production capabilities.

- Rehabilitate and preserve the integrity of the Primary Studio Complex consistent with the HCM designation and restore the currently obstructed public views of the HCM consistent with the HCM designation, while building upon Pereira & Luckman's master plan for a flexible and expandable studio campus.

- Optimize the currently underutilized Project Site to address past ad hoc building additions and meet the existing unmet and anticipated future demands of the entertainment industry by providing new technologically advanced sound stages combined with an adequate and complementary mix of state-of-the-art production support facilities and production offices.

- Complement the neighboring community through design elements that would be compatible with surrounding uses, concentrate building mass and height towards the center of the Project Site, and provide an enhanced public realm to promote walkability, foster connectivity and safety, and better integrate on- and off-site uses.

- Create multiple production basecamps to allow for the flexible and efficient staging of vehicles needed for film and television productions.

- Create a model for environmental sustainability in modern production studio operations by implementing best management practices regarding water, energy, and resource conservation.

- Enhance the identity of the Project Site as an iconic entertainment and media center by providing architecturally distinct development and a creative signage program that reflects and complements the production uses on-site.

V. Alternatives

C. Alternative 3: Reduced Density Alternative

1. Description of the Alternative

Alternative 3, the Reduced Density Alternative, would involve a 20 percent reduction in the Project's proposed development program. Alternative 3 assumes a total of 1,499,200 square feet of development (FAR of 1.4:1), including 280,000 square feet of sound stages, 83,200 square feet of production support, 560,000 square feet of production office, 560,000 square feet of general office, and 16,000 square feet of retail uses. Alternative 3 would involve the construction of 1,251,380 square feet of new development, the demolition of 495,860 square feet of existing studio-related uses and the retention of 247,820 square feet of existing studio-related uses (net increase of 755,520 square feet).

As shown in Figure V-4 on page V-63, Alternative 3 would involve the same general site plan as the Project but with certain reduced building heights and square footages. Although certain building heights may be reduced in comparison to the Project due to the reduction in floor area, the same height zones have been assumed in order to provide sufficient development flexibility. Additionally, Alternative 3 would involve the same rehabilitation of and modifications to the HCM as the Project, discussed in Section IV.B, Cultural Resources, of this Draft EIR.

With regard to parking, approximately 4,240 parking spaces would be provided in three subterranean parking levels along Beverly Boulevard as well as within a nine-level parking structure with two subterranean levels along The Grove Drive, similar to the Project. Basecamp uses would be permitted throughout the Project Site, similar to the Project. Alternative 3 would also include the Project's Mobility Hub and the same frontage areas, building stepbacks, general landscape plan, and streetscape improvements as the Project. Alternative 3 would be designed to meet LEED Gold or equivalent green building standards, and rooftop solar panels would be provided on-site, similar to the Project. In addition, approval of a Specific Plan and Sign District would be sought, similar to the Project.

Since Alternative 3 involves less floor area than the Project, there would be a corresponding reduction in overall construction activity, associated equipment, and the duration of construction, although the peak level of daily activity would be similar to that under the Project. Alternative 3 assumes the same excavation footprint and earthwork

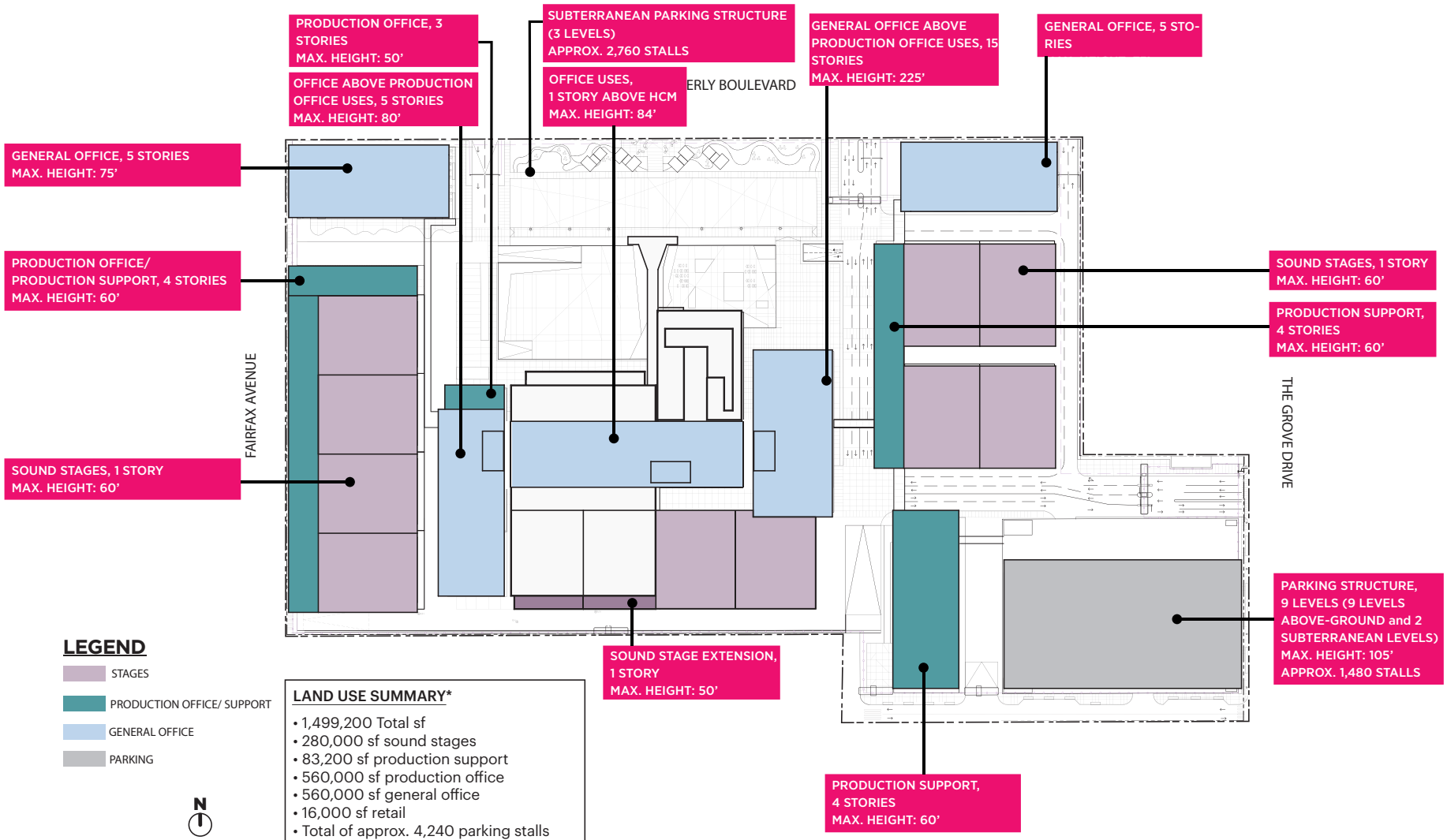


Figure V-4
Alternative 3 Conceptual Site Plan

Source: Rios, 2022.

quantities as the Project, including approximately 772,000 cy of cut, potentially approximately 50,000 cy of imported fill, and up to approximately 772,000 cy of export, with a maximum excavation depth of approximately 45 feet. Like the Project, this analysis assumes that buildout may occur in one phase, with completion in 2026, or that a long-term buildout option could be exercised with completion in 2043.[13]

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

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

Under Alternative 3, the overall amount and duration of construction would be reduced in comparison to the Project because of the 20-percent reduction in total floor area. However, construction of Alternative 3 would require similar amounts of import/export of soil during grading activities as the Project. The intensity of air emissions and fugitive dust from grading and construction activities would be similar to the Project on days when maximum construction activities occur. As maximum daily conditions are used for measuring impact significance, regional impacts on these days would be similar to those of the Project and would be significant and unavoidable, although the duration of such days would be reduced due to the overall reduction in building footprint and associated construction activities. As with the Project, Alternative 3 would implement mitigation measures (Mitigation Measures AIR-MM-1 through AIR-MM-4, set forth in Section IV.A, Air Quality, of this Draft EIR) in order to reduce regional NO_X impacts. However, as with the Project, implementation of mitigation measures would not reduce NO_X impacts to a less-than-significant level. Therefore, impacts associated with regional construction emissions under Alternative 3 would remain significant and unavoidable and similar to the impacts of the Project, which would be significant and unavoidable.

[13] Only those impacts that could vary with a long-term buildout are specifically addressed in the analysis below.

Construction activities under Alternative 3 would be located at similar distances from sensitive receptors as the Project. Since air emissions and fugitive dust from these construction activities would be similar to those of the Project on maximum construction activity days, localized emissions under Alternative 3 would also be similar to those of the Project, although the duration of such days would be reduced due to the overall reduction in building footprint and associated construction activities. Therefore, as with the Project, localized impacts under Alternative 3 would be less than significant with mitigation and similar to the less-than-significant-with-mitigation impacts of the Project.

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 3 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities would represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant construction impacts with regard to TAC emissions. Overall, construction emissions generated by Alternative 3 would be less than those of the Project since Alternative 3 would include 20 percent less floor area and less overall construction activity (although roughly the same peak day construction activity and import/export quantities, as previously discussed). Thus, impacts due to construction-related TAC emissions and the corresponding individual cancer risk under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Similar to the Project, operational regional air pollutant emissions under Alternative 3 would be generated by vehicle trips to the Project Site and the consumption of electricity and natural gas. As discussed in the Alternatives Traffic Memo provided in Appendix P of this Draft EIR, development of Alternative 3 would result in 10,795 daily vehicle trips compared to 13,454 daily vehicle trips under the Project and a corresponding 20-percent reduction in total daily VMT compared to the Project (76,917 total daily VMT under Alternative 3 compared to 95,865 total daily VMT under the Project). As vehicular emissions depend on the number of trips and VMT, vehicular sources associated with Alternative 3 would result in a corresponding decrease in air emissions compared to the Project. In addition, because the overall square footage would be reduced by 20 percent when compared to the Project, the demand for electricity and natural gas would be less than under the Project. Therefore, impacts associated with regional operational emissions under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

With regard to on-site localized area source and stationary source emissions, as with the Project, Alternative 3 would not introduce any major new sources of air pollution within the Project Site. Therefore, similar to the Project, localized impacts from on-site stationary sources under Alternative 3 would also be less than significant. Such impacts would be less than those of the Project due to the 20-percent reduction in total floor area under this alternative. Localized mobile source operational impacts are determined mainly by peak-hour intersection traffic volumes. As discussed above, Alternative 3 would result in a decrease in daily vehicle trips compared to the Project, which would correspond to a decrease in peak-hour trips. Therefore, localized mobile source air quality impacts associated with Alternative 3 operations would be less than significant and less than the Project's less-than-significant impacts.

(b) Toxic Air Contaminants

As discussed in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include diesel particulate matter from delivery trucks. As Alternative 3 would include 20 percent less floor area than the Project, the number of delivery trucks would also be reduced in comparison to the Project. Additionally, the types of uses proposed under both the Project and Alternative 3 are not considered land uses that generate substantial TAC emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities).[14] Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not proposed as part of the Project or Alternative 3. Similar to the Project, Alternative 3 would not release substantial amounts of TACs and would be consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Thus, potential TAC impacts under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

(3) Concurrent Construction and Operation

In the event of a long-term buildout scenario, as with the Project, portions of the Project Site under Alternative 3 could be completed and occupied while completion of construction occurs. The intensity of this interim year air quality impact would remain similar under Alternative 3 since the intensity of construction activity (i.e., the pace at which construction occurs and the amount of equipment used on a daily basis) and the balance of completed and occupied components would be similar. Therefore, concurrent construction and operational regional air quality impacts under Alternative 3 would be significant and

[14] CARB, Air Quality and Land Use Handbook, a Community Health Perspective, April 2005.

unavoidable, but less than the significant and unavoidable impacts of the Project since the overall amount of operations would be reduced under this alternative.

b. Cultural Resources

(1) Historical Resources

As previously discussed and detailed in Section IV.B, Cultural Resources, of this Draft EIR, the Primary Studio Complex within the Project Site is designated as HCM No. 1167, and several historical resources exist in the immediate vicinity, including The Original Farmers Market and Rancho La Brea Adobe (6333 West 3rd Street), Chase Bank (312 North Fairfax Avenue), Fairfax Theater (7901–7909 West Beverly Boulevard), and Air Raid Siren No. 25 (near 309 Ogden Drive).

Alternative 3 would involve a 20 percent reduction in the Project's proposed development program with the same general site plan. Like the Project, buildout under Alternative 3 would alter the immediate surroundings of the Primary Studio Complex by adding new development on-site and replacing existing buildings and expanses of surface parking. The immediate surroundings of the Primary Studio Complex, however, have already been substantially altered since its period of significance (1952-1963), including building expansions, replacement of the front lawn with surface parking, and the introduction of ancillary buildings and structures throughout the Project Site. These changes over time have altered the immediate on-site surroundings such that the immediate setting no longer contributes to the historic significance or integrity of the Primary Studio Complex. As with the Project, Alternative 3 would involve new construction in areas that have already been altered since the period of significance. Additionally, Alternative 3 would include the same rehabilitation of and limited modifications to the HCM as under the Project. Moreover, as with the Project, Alternative 3 would incorporate the Project design features set forth in Section IV.B, Cultural Resources, of this Draft EIR, including the Project Parameters (Project Design Feature CUL-PDF-1), Historic Structure Report (HSR; Project Design Feature CUL-PDF-2), and compliance with the Cultural Heritage Ordinance. Therefore, similar to the Project, buildout under Alternative 3 would not materially impair the historic significance or integrity of the Primary Studio Complex.

More specifically, adherence to the Project Parameters would ensure that Alternative 3 preserves the historic significance and integrity of the Primary Studio Complex. Among other things, the Project Parameters would allow for the removal of non-historic additions and the retention of character-defining features to ensure that the Primary Studio Complex is not adversely impacted. In addition, Alternative 3 would include the preparation of an HSR to guide the rehabilitation of the Primary Studio Complex in accordance with the Secretary of the Interior's Standards for Rehabilitation (Rehabilitation Standards). As under the Project, the City of Los Angeles Office of Historic Resources

(OHR) would use the HSR in reviewing plans and approving permits for Alternative 3, pursuant to the requirements of the Cultural Heritage Ordinance.

As such, like the Project, Alternative 3 would not materially impair the significance of any historical resources located on the Project Site or in the Project Site Vicinity through physical demolition, destruction, relocation, rehabilitation, or new construction.[15] Thus, Alternative 3 would not result in a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. As such, impacts to historical resources would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(2) Archaeological Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, SCCIC records indicate that one historic-period archaeological resource is located south of the Project Site and consists of a brick-lined structure and historic trash scatter dating between the 1910s and 1940s. No archaeological resources have been previously recorded within the Project Site. Alternative 3 would require earthwork activity associated with the subterranean parking with an excavation footprint that is generally the same as the Project, including a maximum excavation depth of 45 feet. Like the Project, Alternative 3 would involve approximately 772,000 cy of cut, potentially approximately 50,000 cy of imported fill, and up to approximately 772,000 cy of export. Therefore, like the Project, Alternative 3 has the potential to uncover previously unidentified archaeological resources. Alternative 3 would also comply with the same regulatory requirements and implement the same mitigation measure as the Project in the event that archaeological resources are uncovered during ground disturbance activities. As such, the potential to uncover previously unidentified archaeological resources would be less than significant with mitigation under Alternative 3, and such impacts would be similar to the less-than-significant-with-mitigation impacts of the Project.

[15] The Historic Report defined the Project Site Vicinity as all parcels immediately adjacent to the Project Site, as well as all parcels located directly across the street from the Project Site. Streets bordering the Project Site include Beverly Boulevard to the north, Fairfax Avenue to the west, The Grove Drive to the east, and the southern property line to the south. The Project Site Vicinity consists of the areas where potential direct or indirect impacts to historical resources could reasonably be expected to occur.

c. Energy

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

Similar to the Project, as discussed in Section IV.C, Energy, of this Draft EIR, construction activities associated with Alternative 3 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be reduced compared to the Project due to the reduction in the overall amount and duration of construction. Furthermore, as with the Project, construction activities under Alternative 3 would comply with all applicable regulatory requirements relating to energy use. Therefore, like the Project, short-term energy use during the construction of Alternative 3 would not occur in a wasteful, inefficient or unnecessary manner, and impacts would be less than significant, similar to the less-than-significant impacts of the Project.

Also like the Project, operation of Alternative 3 would generate an increase in the consumption of electricity, natural gas, and petroleum-based fuels compared to existing conditions. However, Alternative 3 would result in less operational energy demand than the Project due to the 20-percent reduction in floor area. Alternative 3 would include the same amount of solar as the Project. Furthermore, LADWP and SoCalGas have confirmed that the electrical and natural gas infrastructure in the Project area has adequate capacity to serve the Project; thus, adequate capacity would also be available to serve Alternative 3. In terms of petroleum-based fuel usage, the number of daily trips generated by this alternative would be lower in comparison to the Project due to the reduced floor area; thus, fuel usage would be reduced as well. Lastly, the consumption of electricity, natural gas, and petroleum-based fuels under this alternative would not be wasteful, inefficient, or unnecessary since the development would represent an infill project within an urbanized area that is well served by public transportation, which would contribute to an energy efficient land use pattern consistent with SCAG's 2020–2045 RTP/SCS growth forecast. Operation of the proposed uses would comply with applicable energy efficiency standards, and new buildings would be developed in accordance with the latest energy efficiency standards. Therefore, like the Project, long-term energy use during operation of Alternative 3 would not occur in a wasteful, inefficient, or unnecessary manner. Impacts would be less than significant and similar to the less-than-significant impacts of the Project.

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

Alternative 3 would result in less operational energy demand than the Project due to the reduced floor area under this alternative. Like the Project, the consumption of electricity, natural gas, and petroleum-based fuels under this alternative would not be

wasteful, inefficient, or unnecessary since the proposed uses would comply with applicable energy efficiency standards and the development would represent an infill project within an urbanized area that is well served by public transportation, thus contributing to an energy efficient land use pattern consistent with SCAG's 2020–2045 RTP/SCS growth forecast. Therefore, like the Project, Alternative 3 would not conflict with plans or policies regarding renewable energy and energy efficiency, and the alternative would result in less than significant impacts, similar to the less-than-significant impacts of the Project.

d. Geology and Soils

(1) Geologic Hazards

The Project Site is located within the seismically active region of Southern California. Thus, under Alternative 3, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, liquefaction, seismically induced settlement, and subsidence, would be similar to those under the Project, particularly since such impacts are a function of a site's underlying geologic conditions rather than the type of land uses or amount of development proposed. As with the Project, Alternative 3 would be subject to all applicable regulations, including the applicable provisions in the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the California Building Code, the City's General Plan Safety Element, and the Los Angeles Building Code. Lastly, similar to the Project, Alternative 3 would not include uses such as mining operations, deep excavations into the earth, or the boring of large areas creating unstable seismic conditions or stresses in the earth's crust. Therefore, as with the Project, Alternative 3 would not cause or accelerate geologic conditions which could result in substantial damage to proposed structures or infrastructure or expose people to substantial risk of injury. Impacts related to geology and soils under Alternative 3 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(2) Paleontological Resources

As discussed in Section IV.D, Geology and Soils, of this Draft EIR, according to a records search of the paleontological specimen and locality records held by the LACM Vertebrate Paleontology Department and the Paleontology Technical Report prepared by Dudek, there are no previously encountered fossil vertebrate localities located within the Project Site. However, localities have been documented elsewhere in the area from the same geologic units that occur beneath portions of the Project Site, and several of these localities are located within approximately 2,000 feet of the Project Site. Alternative 3 would involve earthwork for subterranean parking and building footings within a similar footprint as the Project, including a maximum excavation depth of 45 feet. Alternative 3 would also involve the same earthwork volumes, specifically, approximately 772,000 cy of cut, potentially approximately 50,000 cy of imported fill, and up to approximately 772,000 cy

of export. Therefore, like the Project, Alternative 3 has the potential to uncover previously unidentified paleontological resources. Alternative 3 would comply with the same regulatory requirements and implement the same mitigation measure (Mitigation Measure GEO-MM-1, set forth in Section IV.D, Geology and Soils, of this Draft EIR) as the Project in the event that paleontological resources are uncovered during ground disturbance activities. As such, the potential to uncover previously unidentified paleontological resources would be less than significant with mitigation, and such impacts would be similar to the less-than-significant-with-mitigation impacts of the Project.

e. Greenhouse Gas Emissions

(1) Construction

Under Alternative 3, the overall amount and duration of construction would be reduced in comparison to the Project given the 20-percent reduction in total floor area. However, construction of Alternative 3 would require similar amounts of import/export of soil during ground disturbance activities as the Project. The mix of construction equipment and emissions factors would be the same under Alternative 3, and overall equipment usage would be slightly reduced in comparison to the Project. As a result, GHG emissions during the construction of Alternative 3 would be less than significant and slightly less than the less-than-significant impacts of the Project.

(2) Operation

As discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, GHG emissions from a development project are determined in large part by the number of daily trips generated and the energy consumption associated with the proposed land uses. As discussed above, Alternative 3 would include 20 percent less floor area, consume less energy, and generate fewer daily vehicle trips than the Project. Thus, the amount of GHG emissions generated by Alternative 3 would be less than the Project. As with the Project, Alternative 3 would be designed to comply with the City's Green Building Ordinance, as applicable, and would incorporate the same sustainability features as set forth in Project Design Features GHG-PDF-1 and GHG-PDF-2 to reduce GHG emissions. Specifically, Alternative 3 would be designed to meet LEED Gold or equivalent green building standards, and rooftop solar panels would be provided on-site, similar to the Project. Overall, Alternative 3 would include the same amount of solar energy generating capacity as the Project. Furthermore, as with the Project, Alternative 3 would represent infill development within an urban area that is well served by public transportation, and, thus, would contribute to an energy efficient land use pattern which would support the goals of the RTP/SCS intended to reduce GHG emissions. Therefore, it is anticipated that Alternative 3, like the Project, would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans. Thus, impacts

related to GHG emissions under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

f. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, hazardous materials, such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, would be used and, therefore, would require proper handling, management, and, in some cases, disposal. The management of any hazardous wastes could increase the opportunity for hazardous materials releases and, subsequently, the exposure of the public to hazardous materials. However, as discussed for the Project in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, all potentially hazardous materials under Alternative 3 would be used, stored, and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use.

With respect to existing conditions, as discussed in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, the Project Site is identified in multiple databases compiled pursuant to Government Code Section 65962.5. These listings collectively constitute a REC and CREC. In addition, like the Project, Alternative 3 would have the potential to encounter contaminated soils, soil gas, and impacted groundwater during construction. Alternative 3 would involve the same general excavation footprint and depth as the Project, and, therefore, the potential to encounter contaminated soils, soil gas, and impacted soil and groundwater during construction would be similar to the Project. Specifically, like the Project, Alternative 3 is anticipated to require the removal of up to approximately 60,000 cy of contaminated soil. As with the Project, any contaminated soils, soil gas, or impacted soil and groundwater encountered would be treated and disposed of in accordance with applicable regulations, and mitigation (Mitigation Measures HAZ-MM-1 and HAZ-MM-2, set forth in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR) would include a soil management plan and subsurface gas controls to reduce potential impacts to less-than-significant levels.

Furthermore, Alternative 3 would involve the same demolition as the Project and would therefore have the same potential to encounter or release ACM or LBP as the Project. Like the Project, Alternative 3 would comply with all applicable regulatory requirements related to hazards, and Alternative 3 would implement the same Project design features as the project (Project Design Features HAZ-PDF-1 through HAZ-PDF-6, set forth in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR), including the preparation of a Hazardous Building Materials Demolition Assessment and Management Plan to the SCAQMD and LAFD for review and approval and sampling for LBP prior to demolition.

Overall, the impacts related to hazards and hazardous materials during construction under Alternative 3 would be less than significant with mitigation, and such impacts would be similar to the less-than-significant-with-mitigation impacts of the Project.

(2) Operation

Operation of Alternative 3 would involve the use of limited quantities of potentially hazardous materials typical of those used in studio campuses, including paints, stains, adhesives, solvents and other materials used in set design and fabrication, fuels, pesticides for landscaping, cleaning and maintenance supplies, materials for pyrotechnic special effects, and other general products related to studio operations, similar to the Project. Like the Project, as discussed in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, all hazardous materials on the Project Site under Alternative 3 would be acquired, handled, used, stored, and disposed of in accordance with all applicable federal, state and local requirements. Project Design Features HAZ-PDF-1 through HAZ-PDF-6, set forth in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR calling for safety and emergency plans and training would be implemented, similar to the Project, and all necessary permits for filming activities and related operations would be obtained, as required. Such safety and emergency plans and training would include the Consolidated Contingency Plan, the Television Studios Emergency Action Plan, the Television Studios Safety Manual, and the Television Studios Injury and Illness Prevention Program. Additionally, like the Project, Alternative 3's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding Project Site access, thus providing adequate emergency access. Overall, impacts would be less than significant, and such impacts would be slightly less than the less-than-significant impacts of the Project as a result the reduced floor area.

g. Hydrology and Water Quality

(1) Surface Water Hydrology

(a) Construction

Similar to the Project, construction activities for Alternative 3 would include the removal of some surface parking areas and new building construction with the same conceptual site plan as the Project. Alternative 3 would require less building construction compared to the Project due to the 20-percent reduction in density, but the development footprint and conceptual layout would remain the same. As with the Project, these activities would have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Also similar to the Project, Alternative 3 would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, Alternative 3 would implement a SWPPP

that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. In addition, Alternative 3 would be required to comply with all applicable City grading permit regulations which establish the measures, plans, and inspections necessary to reduce sedimentation and erosion, similar to the Project. Thus, through compliance with all NPDES Construction General Permit requirements, including preparation of a SWPPP, implementation of BMPs, and compliance with applicable City grading regulations, Alternative 3 would not alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, or flooding on- or off-site. Similarly, with adherence to standard compliance measures, construction activities would not cause flooding, substantially increase or decrease the amount of surface water flow from the Project Site into a water body, or result in a permanent, adverse change to the movement of surface water. Therefore, construction-related impacts to surface water hydrology under Alternative 3 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, Alternative 3 would include the development of new buildings, paved areas, and landscaped areas, with the same conceptual site plan as the Project. As with the Project, Alternative 3 would include up to approximately 90 percent impervious surfaces upon buildout. Accordingly, there would be no increase in runoff volumes into the existing storm drain system. Furthermore, as with the Project, Alternative 3's stormwater infrastructure would be designed to convey the 50-year storm to the designated discharge location. Inlets within the Project Site would be sized to eliminate the potential for ponding. As such, drainage within the Project Site during operations would be similar to existing conditions.

Based on the above, Alternative 3 would not impact existing storm drain infrastructure serving the Project Site, and runoff would continue to follow the same discharge paths and drain to the same storm systems. Consequently, Alternative 3 would not cause flooding during the 50-year storm event, would not create runoff that would exceed the capacity of existing or planned drainage systems, would not require construction of new stormwater drainage facilities or expansion of existing facilities, would not substantially reduce or increase the amount of surface water in a water body, or result in a permanent adverse change to the movement of surface water. Therefore, operational impacts to surface water hydrology under Alternative 3 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(2) Surface Water Quality

(a) Construction

Under Alternative 3, the degree to which new pollutants could be introduced to the Project Site during construction would be reduced compared to the Project since Alternative 3 would involve less construction that would occur over a shorter duration due to the 20-percent reduction in floor area. As with the Project, a SWPPP would be prepared for Alternative 3 and would specify BMPs to be used during construction. As the excavation footprint, depth, and volumes under Alternative 3 would be similar to the Project's, Alternative 3 could require a temporary dewatering system during construction, like the Project.

With the implementation of site-specific BMPs included as part of the SWPPP, Alternative 3 would reduce or eliminate the discharge of potential pollutants from stormwater runoff. In addition, construction of Alternative 3 would be required to comply with City grading permit regulations, which require necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspection to reduce sedimentation and erosion. With compliance with NPDES requirements and City grading permit regulations, construction of Alternative 3 would not result in discharges that violate any water quality standard or waste discharge requirements or otherwise substantially degrade water quality. Furthermore, construction of Alternative 3 would not result in discharges that would cause regulatory standards to be violated in the Ballona Creek Watershed. Therefore, as with the Project, construction-related impacts to surface water quality under Alternative 3 would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project due to the reduction in overall construction activities.

(b) Operation

Like the Project, pollutants to the stormwater system potentially generated by Alternative 3 would include sediment, nutrients, pesticides, metals, pathogens, and oil and grease, similar to existing conditions. Also similar to the Project, Alternative 3 would implement BMPs for managing stormwater runoff in accordance with the City's LID Ordinance requirements. The BMPs would control stormwater runoff such that no increase in runoff over existing conditions would result from the alternative. As with the Project, Alternative 3 would include a capture and use system (or other biofiltration/bioretention system) for irrigation purposes, consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff from the Project Site. With the incorporation of the LID BMPs, operation of Alternative 3 would not result in discharges that would violate any water quality standard or waste discharge requirements, or otherwise substantially degrade water quality. Thus, as with the Project, impacts to surface water quality during operation of Alternative 3 would be less than significant, and such impacts would be slightly less than

the less-than-significant impacts of the Project due to the reduction in development and associated operational activities.

(3) Groundwater Hydrology

(a) Construction

As previously discussed, as with the Project, Alternative 3 could require a temporary dewatering system during construction, which would be installed and operated in accordance with NPDES General Construction Permit requirements. Any discharge of groundwater during construction of Alternative 3 would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements. As discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, no water supply wells are located at the Project Site or within 1 mile of the Project Site that could be impacted by construction. In addition, as with the Project, Alternative 3 would not include the construction of water supply wells. Therefore, construction impacts on groundwater hydrology during construction of Alternative 3 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project given the similar excavation activities and quantities.

(b) Operation

As with the Project, the subterranean parking proposed under Alternative 3 would be designed to withstand hydrostatic forces and would incorporate comprehensive waterproofing systems in accordance with industry standards and construction methods. As such, similar to the Project, permanent dewatering operations are not expected during operation of Alternative 3. As discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, the Project Site is currently 90 percent impervious, and, as such, minimal groundwater recharge occurs. Similar to the Project, Alternative 3 would continue to be comprised of up to approximately 90 percent impervious surfaces following buildout. Therefore, impacts to groundwater hydrology during operation of Alternative 3 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(4) Groundwater Quality

(a) Construction

Similar to the Project, Alternative 3 could require dewatering during construction, which would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements. Pursuant to such requirements, any extracted groundwater would be chemically analyzed to determine the appropriate treatment and/or disposal methods.

During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would, therefore, require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials to be released into groundwater. As this alternative would require less construction activities for a shorter duration when compared to the Project, the use of hazardous materials would be reduced.

In addition, like the Project, Alternative 3 would have the potential to encounter contaminated soils, soil gas, and impacted soil and groundwater during construction. Specifically, like the Project, Alternative 3 is anticipated to require the removal of up to approximately 60,000 cy of contaminated soil. However, Alternative 3 would implement the same mitigation measures (Mitigation Measures HAZ-MM-1 and HAZ-MM-2, set forth in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR) as the Project, including a soil management plan and subsurface gas controls, to ensure potential impacts related to the exposure or release of subsurface gases and impacted soil and groundwater are less than significant. Moreover, compliance with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous waste, would reduce the potential for the construction of Alternative 3 to release contaminants into groundwater that could affect the rate or direction of movement of existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well downstream. Furthermore, as there are no groundwater production wells or public water supply wells on-site or within 1 mile of the Project Site, construction activities would not affect existing wells.

Based on the above, impacts with respect to groundwater quality during construction under Alternative 3 would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project due to the overall reduction in construction activities and a shorter construction duration.

(b) Operation

Operational activities that could affect groundwater quality include spills of hazardous materials. In accordance with City requirements, source control measures, including good housekeeping, removal of trash and maintenance of driveways and parking areas, and proper use and storage of pesticides, would reduce water quality impacts and prevent pollutants from entering the groundwater by percolation within landscaped areas or other permeable surfaces. Alternative 3 is not anticipated to result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise reach groundwater through percolation. Furthermore, there are currently no USTs within the Project Site, and no new USTs would be installed as part of the alternative. Lastly, Alternative 3 would include the same development footprint as the Project.

Therefore, impacts with respect to groundwater quality during operation of Alternative 3 would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project due to the reduction in floor area and associated use of hazardous materials.

h. Land Use and Planning

As previously described, Alternative 3 would involve the development of the same land uses as the Project. Specifically, Alternative 3 would involve a 20 percent reduction in the Project's proposed development program, with a total of 1,499,200 square feet of development (FAR of 1.4:1), including 280,000 square feet of sound stages, 83,200 square feet of production support, 560,000 square feet of production office, 560,000 square feet of general office, and 16,000 square feet of retail uses. This alternative would include the same entitlements as the Project; specifically, adoption of a Specific Plan and an associated General Plan Amendment and Zone Change, establishment of a Sign District, a Vesting Tentative Tract Map, and a Development Agreement. In addition, the unincorporated County parcel would be annexed to the City.

As with the Project, with approval of the requested land use entitlements, Alternative 3 would be consistent with the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site and that were adopted to avoid or mitigate an environmental effect, including, but not limited to, the City's General Plan Framework Element, Wilshire Community Plan, LAMC, and SCAG's 2020–2045 RTP/SCS. Therefore, the impacts of Alternative 3 related to potential conflicts with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

i. Noise

(1) Noise

(a) Construction

The types of construction activities and associated equipment under Alternative 3 would be substantially similar to the Project, although the amount of new construction activities and duration would be reduced due to the reduction in total floor area. As with the Project, construction of Alternative 3 would generate noise from the use of heavy-duty construction equipment, as well as from haul truck and construction worker trips. Under Alternative 3, on- and off-site construction activities and the associated construction noise levels would be similar to those of the Project on maximum activity days since the daily intensity of construction activities would be similar to the Project. As such, noise levels

during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project, but the duration of such days would be reduced due to the overall reduction in building footprint and associated construction activities. Also, Alternative 3 would implement the same Project design features and mitigation measures (Project Design Features NOI-PDF-1 through NOI-PDF-5 and Mitigation Measure NOI-MM-1, set forth in Section IV.I, Noise, of this Draft EIR) as the Project, which would minimize construction noise. Nonetheless, on- and off-site construction noise impacts (both project-level and cumulative) would be significant and unavoidable under Alternative 3, and such impacts would be the same as the Project's significant and unavoidable impacts since noise levels on maximum activity days would be similar.

(b) Operation

As discussed in Section IV.I, Noise, of this Draft EIR, sources of operational noise under the Project would include on-site stationary noise sources, including mechanical equipment, activities within outdoor spaces (i.e., outdoor roof decks and outdoor studio production activities), parking facilities, loading docks, and trash compactors; and off-site mobile (roadway traffic) noise sources. Alternative 3 would introduce similar noise sources as the Project. However, it is anticipated that with the overall reduction in total floor area under this alternative, the noise levels from building mechanical equipment, use of outdoor spaces, and parking facilities would be reduced. Similar to the Project, Alternative 3 would implement the same design features as the Project, including Project Design Feature NOI-PDF-3 (acoustic screening of mechanical equipment), Project Design Feature NOI-PDF-4 (controls on amplified sound), and Project Design Feature NOI-PDF-5 (limits on outdoor studio production within 200 feet of the Shared Eastern Property Line), which would minimize on-site operational noise. Accordingly, operational on-site noise impacts under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project.

With regard to operational off-site (traffic) noise, Alternative 3 would generate less operational traffic than the Project due to the reduction in floor area. The reduction in vehicle trips would result in a decrease in off-site operational traffic-related noise levels under Alternative 3. Therefore, off-site noise impacts under Alternative 3 would be less than significant and less when compared to the less than significant impacts of the Project.

(2) Vibration

(a) Construction

As noted above, the types of construction activities and associated equipment under Alternative 3 would be similar to the Project's, although the amount and duration of construction activities would be reduced. The on- and off-site vibration levels during construction would be similar to those of the Project as construction vibration impacts are

evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment. As such, peak vibration levels generated by construction equipment and construction truck trips under Alternative 3 would be similar to those of the Project, although the duration of such impacts would be reduced due to the overall reduction in building footprint and associated construction activities. Accordingly, construction activities under Alternative 3 would result in the same significant and unavoidable on- and off-site vibration impacts based on the significance threshold for human annoyance and less-than-significant on- and off-site vibration impacts based on the significance threshold for building damage as the Project.

(b) Operation

As described in Section IV.I, Noise, of this Draft EIR, sources of vibration related to Project operations would include vehicle circulation, delivery trucks, and building mechanical equipment. These same sources of operational vibration would occur under Alternative 3. As with the Project, vehicular-induced vibration from Alternative 3, including vehicle circulation within the subterranean parking areas, would not generate perceptible vibration levels at off-site sensitive uses. In addition, as with the Project, building mechanical equipment installed as part of Alternative 3 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include vibration-attenuation mounts to reduce vibration transmission such that the vibration would not be perceptible at any off-site sensitive receptors. Therefore, as with the Project, operation of Alternative 3 would not increase vibration levels in the immediate vicinity of the Project Site. As such, vibration impacts associated with operation of Alternative 3 would also be less than significant. However, such impacts would be less than the less-than-significant impacts of the Project due to the reduction in vehicle trips and floor area under this alternative.

j. Public Services

(1) Fire Protection

(a) Construction

The types of construction activities required for Alternative 3 would be similar to those of the Project, although the overall amount of development, associated construction activities and construction traffic, and the duration of construction would be reduced. Like the Project, construction under Alternative 3 would occur in compliance with all applicable federal, state, and local requirements concerning fire prevention and hazardous materials, which would effectively reduce the potential for construction-related fire and explosion. Additionally, similar to the Project, Alternative 3 would maintain travel lanes on all streets around the Project Site throughout the construction period and implement a Construction Traffic Management Plan, which would include provisions for maintaining emergency

access during construction. Furthermore, emergency vehicles have the ability to avoid traffic delays through the use of sirens to clear paths of travel in accordance with the CVC. Therefore, construction of Alternative 3, like the Project, would not result in the need for new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 3 would be less than significant and such impacts would be slightly less than the less-than-significant impacts of the Project due to the reduction in construction activity.

(b) Operation

Alternative 3 would involve less floor area and associated employment generation than the Project and thus would generate a smaller demand for LAFD fire protection services on a daily basis. Similar to the Project, Alternative 3 would comply with all applicable City Building Code and Fire Code requirements regarding structural design, building materials, Project Site access, fire flow, storage and management of hazardous materials including pyrotechnical supplies, alarm and communications systems, and life safety features (e.g., automatic fire sprinkler systems, fire service access elevators, etc.) and would undergo LAFD fire/life safety plan review, which would reduce the demand for fire protection and emergency medical services and also ensure adequate emergency access. Furthermore, as with the Project, traffic generated by Alternative 3 would not significantly impact emergency vehicle response to the Project Site and surrounding area as the drivers of emergency vehicles have the ability to bypass traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Alternative 3 would be expected to have the same or lower fire flow requirement as the Project, and, thus, LADWP would be able to supply sufficient flow and pressure to satisfy the fire suppression needs. Furthermore, the existing helipad on-site would be retained in approximately the same location on the Project Site, but at a higher elevation, similar to the Project.

Therefore, similar to the Project, this alternative would not necessitate the construction of new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. As such, impacts with regard to fire protection services during operation of Alternative 3 would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project due to the reduction in development and associated service population.

(2) Police Protection

(a) Construction

As discussed above, the types of construction activities under Alternative 3 would be similar to those of the Project; however, the overall amount of development, associated construction activities and construction traffic, and the duration of construction would be

reduced compared to the Project due to the reduced floor area. Similar to the Project, construction activities would not generate a permanent population on the Project Site that would substantially increase the police service population of the Wilshire Community Police Station. In addition, fencing or walls would be used to provide a secure Project Site perimeter, and access would continue to be controlled via staffed guard houses, similar to both existing conditions and the Project. Therefore, as with the Project, construction of Alternative 3 would not contribute to a temporary increased demand for police protection services. With continued implementation of these security measures, the potential demand on police protection services at the Project Site associated with theft and vandalism during construction would be reduced.

Like the Project, Alternative 3 would implement a Construction Traffic Management Plan to ensure the continued provision of emergency access during construction. Additionally, pursuant to CVC Section 21806, emergency vehicles can use their sirens to clear a path of travel or drive in the lanes of opposing traffic during an emergency to avoid traffic. Therefore, as with the Project, construction of Alternative 3 would not result in the need for new or altered government facilities (i.e., police stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 3 would be less than significant, and such impacts would be slightly less than the less-than-significant impacts of the Project due to the reduction in construction activity.

(b) Operation

Like the Project, Alternative 3 would not include any residential uses, and, thus, would not increase the service population of the Wilshire Community Police Station or impact the officer to population ratio within the Wilshire Division. Alternative 3 would implement similar security features as the Project, including a private on-site security staff and regular security patrols, which would reduce the demand for police services, and like the Project, Alternative 3 would generate General Fund tax revenues for the City that could be used to expand law enforcement resources in the Wilshire Division. Therefore, Alternative 3, similar to the Project, would not result in the need for new or altered government facilities (i.e., police stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 3 would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project due to the reduced population.

k. Transportation

Transportation impacts associated with Alternative 3 are addressed in the Alternatives Traffic Memo provided in Appendix P of this Draft EIR. As discussed therein, the transportation-related plans, policies, and programs applicable to the Project would also apply to Alternative 3. As with the Project, this alternative would not interfere with the

complete streets balanced transportation network (i.e., Transit-Enhanced Network, Bicycle Enhanced Network, and Pedestrian-Enhanced Districts) concept of the Mobility Plan and would enhance pedestrian access within and around the Project Site as called for by the Mobility Plan and the Wilshire Community Plan. The alternative would also prioritize safety and access for all individuals utilizing the Project Site by complying with all ADA requirements as required by the LAMC; include sidewalk and driveway design, vehicular parking, bicycle parking, etc., in accordance with LAMC requirements; and represent urban infill development within a TPA and HQTA in close proximity to transit, which would encourage alternative transportation use as called for by the Mobility Plan and 2020–2045 RTP/SCS. Alternative 3 would support these transportation plans for the same reasons as the Project and would include a Mobility Hub, similar roadway and sidewalk improvements, sufficient parking, etc. Alternative 3 would also implement a TDM Program to reduce VMT, as called for by the Mobility Plan, Wilshire Community Plan, 2020–2045 RTP/SCS, and the City's TDM Ordinance.

Furthermore, as discussed in Section IV.K, Transportation, of this Draft EIR, Fairfax Avenue and Beverly Boulevard adjacent to the Project Site and West 3rd Street to the south are identified as part of the Vision Zero's High Injury Network. As with the Project, it is assumed Alternative 3 would include the Project's off-site Vision Zero safety improvements, including bus stop improvements along the Project Site perimeter along Fairfax Avenue and Beverly Boulevard, which would include adequate benches, shelters, lighting, LED displays, and signage to the extent feasible under the City of Los Angeles' current bus shelter contract; and a financial contribution toward the funding of pedestrian facilities and safety improvements within area. The alternative's improvements to the pedestrian environment would not preclude future Vision Zero safety improvements by the City. Additionally, as with the Project, the Project Applicant would contribute to signal improvements at nearby intersections, as required by LADOT.

Therefore, as with the Project, Alternative 3 would not conflict with a program, plan, ordinance, or policy addressing the circulation system. Impacts would be less than significant and similar to the less-than-significant impacts of the Project.

With respect to VMT, Alternative 3 would generate a lower total work VMT but similar work VMT per employee as compared to the Project. Alternative 3 would generate an estimated 41,876 daily work VMT and an average work VMT per employee of 6.7, which would be below the work VMT per employee significance threshold of 7.6 for the Central APC. Therefore, as with the Project, Alternative 3 would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b), regarding VMT, and impacts would be less than significant. Overall, Alternative 3 would have a lesser VMT impact than the Project because it would generate an estimated 76,917 total VMT compared to an estimated 95,865 total VMT for the Project.

Regarding freeway safety, as discussed in the Alternatives Traffic Memo, Alternative 3 would not add 50 feet or more to queues on the US-101 southbound off-ramp at Highland Avenue during either peak hour and, thus, would not exceed the ramp storage length. Specifically, Alternative 3 would generate an estimated 33 morning peak-hour trips and 13 afternoon peak-hour trips on the US-101 southbound off-ramp at Highland Avenue, as compared to the Project's estimated 42 morning peak-hour trips and 16 afternoon peak-hour trips on the off-ramp. Therefore, like the Project, Alternative 3 would neither be subject to speed differential analyses nor cause a significant freeway safety impact. Impacts related to freeway safety would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project.

l. Tribal Cultural Resources

As previously discussed, Alternative 3 would require earthwork within the same general footprint as the Project and a similar maximum excavation depth of 45 feet. Like the Project, Alternative 3 would involve approximately 772,000 cy of cut, potentially approximately 50,000 cy of imported fill, and up to approximately 772,000 cy of export. Therefore, like the Project, Alternative 3 has the potential to uncover previously unidentified tribal cultural resources. As discussed in Section IV.L, Tribal Cultural Resources, of this Draft EIR, no tribal cultural resources have been previously recorded at the Project Site. Nonetheless, Alternative 3 would implement the City's standard Condition of Approval for the inadvertent discovery of tribal cultural resources, which would ensure that any impacts to tribal cultural resources would remain less than significant. Therefore, impacts under Alternative 3 related to tribal cultural resources would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

m. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities for Alternative 3 would result in a temporary water demand for dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. Despite the reduction in floor area and construction activity and duration, construction-related water use under Alternative 3 would be fairly similar to the Project's due to the similar earthwork activities, volumes, and footprints. Furthermore, while Alternative 3 would require trenching for connection to the existing water mains in the adjacent streets similar to the Project, Alternative 3 would similarly implement a Construction Traffic Management Plan to ensure the safe and efficient flow of pedestrian and vehicular traffic around the Project Site during construction. As such, as with the Project, Alternative 3 would not result in construction activities that require or result in the relocation or construction of new or expanded water facilities, the construction or

relocation of which could cause significant environmental impacts. Therefore, impacts under Alternative 3 related to water supply and infrastructure during construction would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, Alternative 3 would result in an increase in long-term water demand. However, based on the reduction in total development as compared to the Project, water demand for Alternative 3 would be less than the Project's estimated increase in water demand. Specifically, the water demand for Alternative 3 would be an estimated 210,696 gpd, as compared to the Project's water demand of an estimated 313,176 gpd under the proposed development program.[16]

Thus, as with the Project, the estimated water demand under Alternative 3 could be met by LADWP's projected water supplies, including in normal, single-dry, and multi-dry years through the year 2045. In addition, the existing water distribution infrastructure would be adequate to serve Alternative 3 since the water demand would be less than under the Project. Furthermore, similar to the Project, Alternative 3 would implement all necessary on-site infrastructure and connections to the LADWP water system pursuant to applicable City requirements. Therefore, impacts under Alternative 3 related to water supply and infrastructure during operation would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Limited wastewater generation may occur incrementally throughout construction of Alternative 3, and wastewater flows would be less than the Project's due to the 20-percent reduction in floor area. Furthermore, such flows would be temporary and could be accommodated by the existing infrastructure since the Project's flows could be accommodated. In addition, construction workers would typically utilize portable restrooms, which would not contribute directly to the wastewater system that serves the Project Site but would eventually be treated at the HWRP, which has ample available capacity. As with the Project, new sewer line connections would be required to connect the proposed buildings to the main sewer infrastructure system in the streets surrounding the Project Site. Construction impacts associated with new connections would primarily be

[16] The Project could generate a maximum estimated water demand of an estimated 313,785 gpd under the proposed land use exchange program.

confined to trenching for the placement of pipe and connection into the existing main sewer lines, and any off-site work that could potentially affect existing sewer service to adjacent properties would be coordinated with the BOE. As such, Alternative 3, like the Project, would not require or result in the relocation or construction of new or expanded wastewater facilities, the construction or relocation of which could cause significant environmental effects during the construction period. Therefore, similar to the Project, impacts under Alternative 3 related to wastewater during construction would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project due to the reduction in floor area and associated construction activity.

(b) Operation

As with the Project, operation of Alternative 3 would increase wastewater flows from the Project Site. However, based on the relative reduction in total floor area, operational wastewater generation under Alternative 3 would be less than under the Project. Specifically, wastewater generation for Alternative 3 would be an estimated 192,434 gpd, as compared to the Project's wastewater generation of an estimated 261,785 gpd under the conceptual development scenario.[17]

As provided in Section IV.M.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the wastewater generated during Project operation could be accommodated by the existing remaining capacity of the HWRP. As operational wastewater generation under Alternative 3 would be less than under the Project, HWRP would have adequate capacity to serve Alternative 3.

Regarding wastewater conveyance (sewer) capacity, as discussed in Section IV.M.2, Utilities and Service Systems—Wastewater, of this Draft EIR, sewer service for the Project would be provided utilizing new or existing on-site sewer connections to the existing off-site sewer lines in the adjacent streets. According to the Utility Report prepared for the Project, the sewer lines serving the Project Site have adequate capacity to serve the Project. Since Alternative 3 would generate less operational wastewater than the Project, the local sewer lines would have adequate capacity to serve Alternative 3. Also, as with the Project, detailed gauging and evaluation would be conducted for Alternative 3, as required by LAMC Section 64.14, to obtain final approval of a sewer capacity and connection permit during the permitting process. Furthermore, as with the Project, all sanitary sewer connections and on-site infrastructure under Alternative 3 would be designed and constructed in accordance with applicable regulatory standards.

[17] The Project could generate maximum estimated wastewater flows of an estimated 262,160 gpd under the proposed land use exchange program.

Based on the above, operation of Alternative 3, as with the Project, would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. Therefore, impacts under Alternative 3 related to wastewater during operation would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project.

(3) Electric Power, Natural Gas, and Telecommunications Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 3 would consume minor quantities of electricity (construction activities do not typically involve the consumption of natural gas or use of hard-wired telecommunications facilities). The energy consumed during construction of Alternative 3 would be less than under the Project due to the 20-percent reduction in floor area, associated construction activities, and the duration of construction. Furthermore, because the Project Site is an urban infill site that is already served by energy infrastructure, like the Project, it is anticipated that Alternative 3 would not require the construction of off-site energy infrastructure improvements. Lastly, like the Project, Alternative 3 would be required to coordinate energy infrastructure improvements with LADWP and SoCalGas and develop on-site energy infrastructure and connections to the existing off-site energy infrastructure in accordance with applicable regulatory requirements. Hence, like the Project, construction activities under Alternative 3 would not result in an increase in energy demand that exceeds available distribution infrastructure capabilities that would require the construction of new or expanded energy facilities, the construction of which could cause significant environmental effects. Therefore, impacts on energy and telecommunications infrastructure associated with short-term construction activities under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 3 would increase the demand for electricity, natural gas, and telecommunications relative to existing conditions. However, Alternative 3 operations would result in less demand than the Project, due to the reduction in floor area. Hence, Alternative 3 would result in reduced operational impacts on energy and telecommunications infrastructure when compared to the Project. Also, as discussed in the Utility Report, LADWP and SoCalGas have confirmed that the existing energy infrastructure in the area is sufficient to serve the Project. Because Alternative 3 would result in less operational energy demand than the Project, the existing energy infrastructure in the area would also be adequate to serve Alternative 3. Similarly, private telecommunications providers would be expected to expand service capacities as needed

to meet demand. Therefore, as with the Project, Alternative 3 operation would not result in an increase in energy or telecommunications demand that exceeds available distribution infrastructure capabilities that would require the construction of new or expanded facilities, the construction of which could cause significant environmental effects. Impacts on energy and telecommunications infrastructure under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

3. Comparison of Impacts

Alternative 3 would not avoid or substantially lessen the Project-level and cumulative significant and unavoidable impacts with respect to regional construction emissions; regional emissions associated with concurrent construction and operations; Project-level and cumulative on- and off-site noise during construction; and Project-level on-site vibration and Project-level and cumulative off-site vibration (based on the significance threshold for human annoyance) during construction. These impacts would continue to be significant and unavoidable under Alternative 3, although the duration of such impacts would be reduced due to the overall reduction in building footprint and associated construction activities.

Alternative 3 would result in similar less-than-significant-with-mitigation impacts as the Project with regard to localized construction-related emissions; archaeological resources; geology and soils; paleontological resources; and hazards and hazardous materials during construction.

Furthermore, Alternative 3 would result in similar less-than-significant impacts as the Project with regard to historic resources; energy; surface water and groundwater hydrology; land use and planning; on- and off-site construction-related vibration based on the significance threshold for building damage; consistency with transportation plans, programs, and policies; tribal cultural resources; and water supply and infrastructure during construction.

Alternative 3 would reduce several of the less-than-significant impacts associated with the Project, specifically regional and localized emissions during operation; TACs; GHG emissions; hazards and hazardous materials during operation; surface water and groundwater quality; operational noise; operational vibration; fire protection; police protection; VMT; freeway safety; water supply and infrastructure during operation; wastewater; and energy and telecommunications infrastructure.

4. Relationship of the Alternative to Project Objectives

As previously discussed, Alternative 3 would involve a 20-percent reduction in the Project's proposed development program, with a total of 1,499,200 square feet of development (FAR of 1.4:1), including 280,000 square feet of sound stages, 83,200 square feet of production support, 560,000 square feet of production office, 560,000 square feet of general office, and 16,000 square feet of retail uses. Alternative 3 would also include a Mobility Hub and the same frontage areas, building stepbacks, general landscape plan, and streetscape improvements as the Project. While the amount of development under this alternative would be less than under the Project, Alternative 3 would generally meet the underlying purpose of the Project, which is to maintain Television City as a studio use and to modernize and enhance production facilities within the Project Site to meet both the existing unmet and anticipated future demands of the entertainment industry, keep production activities and jobs in Los Angeles, upgrade utility and technology infrastructure, and create a cohesive studio lot. However, Alternative 3 would be less effective than the Project in meeting this purpose as a result of the reduced amount of development under this alternative, which would reduce on-site synergies and production capacity.

Regarding the Project objectives, Alternative 3 would meet the following Project objectives generally as effectively as the Project:

- Rehabilitate and preserve the integrity of the Primary Studio Complex consistent with the HCM designation and restore the currently obstructed public views of the HCM consistent with the HCM designation, while building upon Pereira & Luckman's master plan for a flexible and expandable studio campus.

- Complement the neighboring community through design elements that would be compatible with surrounding uses, concentrate building mass and height towards the center of the Project Site, and provide an enhanced public realm to promote walkability, foster connectivity and safety, and better integrate on- and off-site uses.

- Provide adequate, safe, and efficient ingress/egress, circulation, staging, and parking that satisfies the unique demands of a large-scale production studio with direct, enhanced access to the uses on-site and sufficient truck and trailer circulation areas, in compliance with modern fire and life safety requirements.

- Create multiple production basecamps to allow for the flexible and efficient staging of vehicles needed for film and television productions.

- Provide multi-modal transportation solutions, including a Project Mobility Hub, to connect TVC employees and guests with surrounding public transit lines, employee shuttles, and a rideshare program, to encourage alternative means of

transportation, and focus growth in a high-density, jobs-rich area in close proximity to transit.

- Create a model for environmental sustainability in modern production studio operations by implementing best management practices regarding water, energy, and resource conservation.

- Enhance the identity of the Project Site as an iconic entertainment and media center by providing architecturally distinct development and a creative signage program that reflects and complements the production uses on-site.

Alternative 3 would partially meet the following Project objectives or would not meet the objectives as well as the Project, due to the reduced amount of development under this alternative:

- Create a fully integrated and cohesive master planned site regulated by a Specific Plan that retains the Project Site's land use as a studio facility and provides an expandable, flexible, and operationally seamless production ecosystem that is able to respond to evolving market demands, support content creation, and maximize studio production capabilities.

- Promote local and regional economic growth by creating a wide range of entertainment jobs as well as construction jobs and keeping production jobs in Los Angeles.

- Contribute to Los Angeles' status as a global creative capital and provide maximum opportunity for productions to be filmed in the region through the continued use and expansion of the Project Site as a major studio and entertainment institution, in conformance with the goals and objectives of applicable local and regional plans and policies.

- Optimize the currently underutilized Project Site to address past ad hoc building additions and meet the existing unmet and anticipated future demands of the entertainment industry by providing new technologically advanced sound stages combined with an adequate and complementary mix of state-of-the-art production support facilities and production offices.

- Permit a reasonable, risk-adjusted return on investment commensurate with the Project Applicant's fiduciary responsibilities and allow for sustained economic viability and growth in an evolving entertainment market, while generating tax and property revenues to the City.

V. Alternatives

D. Alternative 4: Mixed-Use Alternative

1. Description of the Alternative

Alternative 4, the Mixed-Use Alternative, would involve a combination of studio, residential, and retail uses. Alternative 4 would provide a total of 3,696,370 square feet of development, including 2,772,000 square feet of residential uses and 924,370 square feet of studio and commercial uses. Alternative 4 assumes the construction of 3,047,400 square feet of new development, the demolition of 94,710 square feet of existing studio-related uses, and the retention of 648,970 square feet of existing studio-related uses. New construction would include 2,772,000 square feet of residential uses, 36,000 square feet of sound stages, 41,400 square feet of production support, 138,000 square feet of general office uses, and 60,000 square feet of retail uses. The sitewide FAR would be 3.45:1, while the commercial FAR would be 0.86:1, and the residential FAR would be 2.59:1.[18] The residential uses would include 3,680 units within three residential towers, with a mix of studios (734 units), one-bedroom units (1,834 units), two-bedroom units (1,100 units), and three-bedroom penthouse units (12 units), of which 14 percent (516 units) would be affordable units for Very Low-Income households. This would represent a density bonus of 35 percent in lieu of the maximum 70 percent increase permitted under TOC Tier 3. In addition, residential amenities would be provided in each tower, including a total of three pools and three fitness centers, and an approximately 35,000-square-foot open space would be provided at ground level.

As shown in Figure V-5 on page V-92, the conceptual layout of the new development under Alternative 4 would include three residential towers along Fairfax Avenue, each 30 stories in height over a six-story above-grade parking podium (maximum tower heights of 400 feet), with ground floor retail uses and four levels of subterranean parking. New development on the eastern portion of the Project Site would include a six-story office building (maximum height of 90 feet) with two levels of subterranean parking located along Beverly Boulevard east of Genesee Avenue, and in the southeast portion of the Project Site, a four-story production support building (maximum height of 60 feet) connected to two single-story sound stages (maximum height of 60 feet) and a four-level parking structure (maximum height of 45 feet) with three levels of subterranean parking. Approximately 5,880 parking spaces would be provided, allowing for one parking space per residential unit plus sufficient studio and commercial parking.

[18] Based on the Project Site's location in a Tier 3 TOC, an FAR of up to 3.75:1 would be permitted.

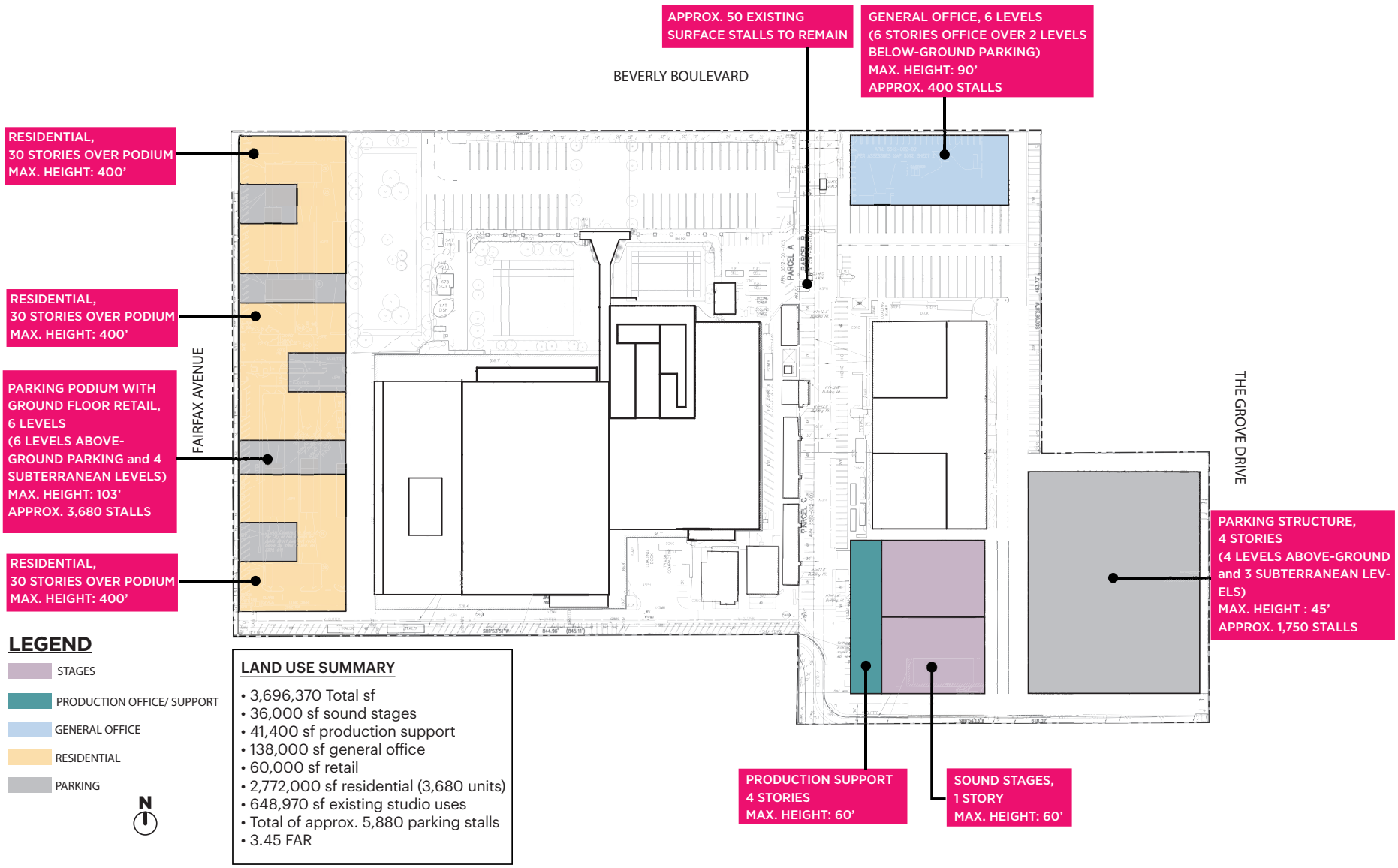


Figure V-5
Alternative 4 Conceptual Site Plan

Source: Rios, 2022.

Alternative 4 would include a Specific Plan and Sign District similar to those of the Project, and similar height zones would be established. However, the maximum height limit in Height Zone C along Fairfax Avenue and Beverly Boulevard would be increased from 160 feet to 400 feet to accommodate the residential towers.[19] Alternative 4 would also include a Mobility Hub and the same frontage areas, building stepbacks, general landscape plan, and streetscape improvements as the Project. Additionally, rooftop solar panels would be provided on-site, similar to the Project. Further, basecamp uses would be permitted in the non-residential areas but would be more limited in size than under the Project.

Since Alternative 4 involves substantially more floor area than the Project and the introduction of residential high-rise towers, there would be a corresponding increase in overall construction activity, associated equipment, and the duration of construction, although the peak level of daily activity would be similar to that under the Project. Earthwork would involve approximately 505,000 cy of cut, potentially approximately 16,000 cy of imported fill, and up to approximately 505,000 cy of export, with a maximum excavation depth of approximately 48 feet. Like the Project, this analysis assumes that buildout may occur in one phase, with completion in 2026, or that a long-term buildout option could be exercised with completion in 2043.[20]

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

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

[19] While there are no height limits based on the existing zoning regulations for the Project Site, height limits would be imposed by a Specific Plan.

[20] Only those impacts that could vary with a long-term buildout are specifically addressed in the analysis below.

Under Alternative 4, the overall amount of new construction would be greater in comparison to the Project (3,047,400 square feet of new development under Alternative 4 and 1,626,180 square feet of new development under the Project, which equates to an approximately 87 percent increase in new development under Alternative 4) because of the addition of 3,680 dwelling units (approximately 2,772,000 square feet), while new development of sound stages, production support, and production offices would be reduced as compared to the Project. However, construction of Alternative 4 would require approximately 37 percent less import/export of soil during grading activities. Thus, construction of Alternative 4 would require less excavation and grading, but more building construction. The intensity of air emissions and fugitive dust from grading and construction activities would be similar to the Project on days when maximum construction activities occur. As maximum daily conditions are used for measuring impact significance, regional impacts on these days would be similar to those of the Project and would be significant and unavoidable, although the duration of such impacts would be reduced due to the reduction in the overall import/export of soil during grading activities. As with the Project, Alternative 4 would implement mitigation measures (Mitigation Measures AIR-MM-1 through AIR-MM-4, set forth in Section IV.A, Air Quality, of this Draft EIR) in order to reduce regional NO_X impacts. However, as with the Project, implementation of mitigation measures would not reduce NO_X impacts to a less-than-significant level. Therefore, impacts associated with regional construction emissions under Alternative 4 would remain significant and unavoidable and similar to the impacts of the Project, which would also be significant and unavoidable.

Construction activities under Alternative 4 would be located at similar distances from sensitive receptors as the Project. Since air emissions and fugitive dust from these construction activities would be similar to those of the Project on maximum construction activity days, localized emissions under Alternative 4 would also be similar to those of the Project, although the duration of such impacts would be reduced due to the reduction in the import/export of soil during grading activities. Therefore, as with the Project, localized impacts under Alternative 4 would be less than significant with mitigation and similar to the less-than-significant-with-mitigation impacts of the Project.

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 4 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities would represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. Overall, construction emissions generated by Alternative 4 would be similar to those of the Project since Alternative 4 would include less import/export of soils, but more building construction associated with the increase in new development. Thus, impacts due to TAC emissions and the corresponding

individual cancer risk under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Similar to the Project, operational regional air pollutant emissions under Alternative 4 would be generated by vehicle trips to the Project Site and the consumption of electricity and natural gas. As discussed in the Alternatives Traffic Memo provided in Appendix P of this Draft EIR, development of Alternative 4 would result in an estimated 23,230 daily vehicle trips when compared to 13,454 daily vehicle trips under the Project and a corresponding approximately 49-percent increase in total daily VMT compared to the Project (142,912 total daily VMT under Alternative 4 compared to 95,865 total daily VMT under the Project). As vehicular emissions depend on the number of trips, vehicular sources would result in a greater increase in air emissions compared to the Project. In addition, because the overall square footage would be substantially increased when compared to the Project (a total of 3,696,370 square feet of development under Alternative 4 and a total of 1,874,000 square feet of development under the Project, for an approximately 97 percent increase in total development under Alternative 4), the demand for electricity and natural gas would be more than under the Project. Further, with the incorporation of the residential towers, Alternative 4 would result in a substantial increase in VOC emissions from consumer products. Therefore, regional operational emissions of NO_X and VOC under Alternative 4 would result in new significant and unavoidable air quality impacts that would not occur under the Project.[21] As such, impacts associated with regional operational emissions under Alternative 4 would be significant and unavoidable and greater than the Project's less-than-significant impacts.

With regard to on-site localized area source and stationary source emissions, as with the Project, Alternative 4 would not introduce any major new sources of air pollution within the Project Site. Therefore, similar to the Project, localized impacts from on-site emission sources under Alternative 4 would also be less than significant. Such impacts would be greater than those of the Project due to the overall increase in net new building square footage. Localized mobile source operational impacts are determined mainly by peak-hour intersection traffic volumes. As discussed above, Alternative 4 would result in an increase in daily vehicle trips when compared to the Project. Per the SCAQMD's Air Quality Management Plan (AQMP) methodology, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed carbon monoxide (CO) hot spot analysis. During operation of Alternative 4, the highest average

[21] Refer to the air quality calculations provided in Appendix B of this Draft EIR.

number of daily trips at any intersection would be approximately 65,490 trips at La Brea Avenue and Beverly Boulevard, which is substantially below the daily traffic volumes expected to generate CO exceedances as evaluated in the 2003 AQMP.[22] As the daily trips at this intersection would increase slightly in comparison to the Project (which would generate an estimated 65,260 daily trips), Alternative 4 would result in a greater impact than the Project's less-than-significant impact. However, the impact would remain less than significant.

(b) Toxic Air Contaminants

As discussed in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include diesel particulate matter from delivery trucks. As this alternative would be greater in size than the Project, the number of delivery trucks would likely increase in comparison to the Project. Additionally, the types of uses proposed under both the Project and Alternative 4 are not considered land uses that generate substantial TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not proposed by the Project or Alternative 4. Similar to the Project, Alternative 4 would not release substantial amounts of TACs and would be consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Thus, potential TAC impacts under Alternative 4 would be less than significant, but greater than the less-than-significant impacts of the Project.

(3) Concurrent Construction and Operation

In the event of a long-term buildout scenario, as with the Project, portions of the Project Site under Alternative 4 could be completed and occupied while completion of construction occurs. The intensity of this interim year air quality impact would remain similar under Alternative 4 since the intensity of construction activity (i.e., the pace at which construction occurs and the amount of equipment used on a daily basis) and the balance of completed and occupied components would be similar. Concurrent construction and operational regional air quality impacts under Alternative 4 would be significant and unavoidable and greater than the significant and unavoidable impacts of the Project since operational emissions of VOCs and NO_X would increase under this alternative.[23]

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[22] *The 2003 AQMP estimated that the one-hour concentration for this intersection was 4.6 ppm, which indicates that the most stringent one-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day.*

[23] Refer to the air quality calculations provided in Appendix B of this Draft EIR.

b. Cultural Resources

(1) Historical Resources

As previously discussed and detailed in Section IV.B, Cultural Resources, of this Draft EIR, the Primary Studio Complex within the Project Site is designated as HCM No. 1167, and several historical resources exist in the immediate vicinity, including The Original Farmers Market and Rancho La Brea Adobe (6333 West 3rd Street), Chase Bank (312 North Fairfax Avenue), Fairfax Theater (7901–7909 West Beverly Boulevard), and Air Raid Siren No. 25. (near 309 Ogden Drive).

Although no changes to the HCM would occur, as with the Project, buildout under Alternative 4 would alter the immediate surroundings of the Primary Studio Complex by adding new construction to the Project Site and replacing existing buildings and expanses of surface parking. The immediate surroundings of the Primary Studio Complex, however, have already been substantially altered since its period of significance (1952–1963), including building expansions, replacement of the front lawn with surface parking, and the introduction of ancillary buildings and structures throughout the Project Site.

These changes over time have altered the immediate on-site surroundings such that the immediate setting no longer contributes to the historic significance or integrity of the Primary Studio Complex. As with the Project, Alternative 4 would involve new construction in areas that have already been altered since the period of significance. Therefore, similar to the Project, buildout under Alternative 4 would not materially impair the historic significance or integrity of the Primary Studio Complex. However, Alternative 4 would not achieve any of the benefits to the HCM proposed under the Project. Specifically, the Primary Studio Complex would not be rehabilitated, the visibility and prominence of the Primary Studio Complex as viewed from Beverly Boulevard would not be reestablished, and the currently compromised character-defining features would not be restored. Additionally, Alternative 4 would result in substantially increased building heights and overall density than the Project, which could be considered visually incompatible with the HCM. In particular, the addition of the 400-foot residential towers would radically alter the setting of the Primary Studio Complex on its west side. Notwithstanding, under Alternative 4, the Primary Studio Complex itself would remain unchanged and the open area between the Primary Studio Complex and Beverly Boulevard, which is the most important setting feature, would remain undeveloped. The new construction under Alternative 4 would be physically separate from the Primary Studio Complex as well. While the rehabilitation aspects of the Project would not be implemented and thus the Project benefits would not be achieved, Alternative 4 would not substantially reduce the integrity of the historic resource from that of its current condition.

As such, like the Project, Alternative 4 would not materially impair the significance of any historical resources located on the Project Site or in the Project Site Vicinity through physical demolition, destruction, relocation, rehabilitation, or new construction.[24] Thus, Alternative 4 would not result in a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. As such, impacts to historical resources would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project since the HCM would not be rehabilitated and would not be directly modified from its current condition. However, as previously indicated, Alternative 4 would not achieve any of the Project benefits to the HCM.

(2) Archaeological Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, SCCIC records indicate that one historic-period archaeological resource is located south of the Project Site and consists of a brick-lined structure and historic trash scatter dating between the 1910s and 1940s. No archaeological resources have been previously recorded within the Project Site. Alternative 4 would require earthwork activity associated with the subterranean parking with a maximum excavation depth of approximately 48 feet, compared to the maximum excavation depth of approximately 45 feet for the Project. Alternative 4 would involve approximately 505,000 cy of cut, as compared to the approximately 772,000 cy of cut for the Project. Like the Project, Alternative 4 has the potential to uncover previously unidentified archaeological resources. However, this potential would be less than with the Project due to the overall reduction in excavation as a result of the smaller footprint of new development. Nevertheless, Alternative 4 would also comply with the same regulatory requirements and implement the same mitigation measure (Mitigation Measure CUL-MM-1, set forth in Section IV.B, Cultural Resources, of this Draft EIR) as the Project in the event that archaeological resources are uncovered during ground disturbance activities.

As such, the potential to uncover previously unidentified archaeological resources would be less than significant with mitigation under Alternative 4, and, due to the overall reduction in excavation, such impacts would be less than the less-than-significant-with-mitigation impacts of the Project.

[24] The Historic Report defined the Project Site Vicinity as all parcels immediately adjacent to the Project Site, as well as all parcels located directly across the street from the Project Site. Streets bordering the Project Site include Beverly Boulevard to the north, Fairfax Avenue to the west, The Grove Drive to the east, and the southern property line to the south. The Project Site Vicinity consists of the areas where potential direct or indirect impacts to historical resources could reasonably be expected to occur.

c. Energy

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

Similar to the Project as discussed in Section IV.C, Energy, of this Draft EIR, construction activities associated with Alternative 4 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would increase compared to the Project due to the increase in the net new development, overall amount of construction, and duration of construction under this alternative. Furthermore, as with the Project, construction activities under Alternative 4 would comply with all applicable regulatory requirements relating to energy use. Therefore, like the Project, short-term energy use during construction of Alternative 4 would not occur in a wasteful, inefficient, or unnecessary manner, and impacts would be similar to the less-than-significant impacts of the Project.

Also like the Project, operation of Alternative 4 would generate an increase in the consumption of electricity, natural gas, and petroleum-based fuels compared to existing conditions. Because the overall square footage would be substantially increased when compared to the Project and the proposed land uses would include a more energy-intensive use (i.e., residential dwelling units), the demand for electricity and natural gas would be greater than the Project's. In terms of petroleum-based fuel usage, the number of daily trips generated by this alternative would be approximately 49 percent more in comparison to the Project due to the increase in square footage and residential dwelling units. Nonetheless, it is assumed that the electrical and natural gas infrastructure in the Project area has adequate capacity to serve Alternative 4 or can be readily upgraded by the utility providers. Lastly, the consumption of electricity, natural gas, and petroleum-based fuels under this alternative would not be wasteful, inefficient, or unnecessary since the development would represent an infill project within an urbanized area that is well served by public transportation, which would contribute to an energy efficient land use pattern consistent with SCAG's 2020–2045 RTP/SCS growth forecast. Operation of the proposed uses would comply with applicable energy efficiency standards, and new buildings would be developed in accordance with the latest energy efficiency standards. Therefore, like the Project, long-term energy use during operation of Alternative 4 would not occur in a wasteful, inefficient, or unnecessary manner. Impacts would be less than significant and similar to the less-than-significant impacts of the Project.

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

As indicated above, Alternative 4 would result in greater operational electricity and natural gas consumption than the Project and greater operational petroleum-based fuel

consumption. Like the Project, the consumption of electricity, natural gas, and petroleum-based fuels under this alternative would not be wasteful, inefficient, or unnecessary since the proposed uses would comply with applicable energy efficiency standards and the development would represent an infill project within an urbanized area that is well served by public transportation, thus contributing to an energy efficient land use pattern consistent with SCAG's 2020–2045 RTP/SCS growth forecast. Therefore, like the Project, Alternative 4 would not conflict with plans or policies regarding renewable energy and energy efficiency, and the alternative would result in less-than-significant impacts, similar to the less-than-significant impacts of the Project.

d. Geology and Soils

(1) Geologic Hazards

The Project Site is located within the seismically active region of Southern California. Thus, under Alternative 4, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, liquefaction, seismically induced settlement, and subsidence, would be similar to those under the Project, particularly since such impacts are a function of a site's underlying geologic conditions rather than the type of land uses or amount of development proposed. As with the Project, Alternative 4 would be subject to all applicable regulations, including the applicable provisions in the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the California Building Code, the City's General Plan Safety Element, and the Los Angeles Building Code. Lastly, similar to the Project, Alternative 4 would not include uses such as mining operations, deep excavations into the earth, or the boring of large areas creating unstable seismic conditions or stresses in the earth's crust. Therefore, as with the Project, Alternative 4 would not cause or accelerate geologic conditions which could result in substantial damage to proposed structures or infrastructure or expose people to substantial risk of injury. Impacts related to geology and soils under Alternative 4 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(2) Paleontological Resources

As discussed in Section IV.D, Geology and Soils, of this Draft EIR, according to a records search of the paleontological specimen and locality records held by the LACM Vertebrate Paleontology Department and the Paleontology Technical Report prepared by Dudek, there are no previously encountered fossil vertebrate localities located within the Project Site. However, localities have been documented elsewhere in the area from the same geologic units that occur beneath portions of the Project Site, and several of these localities are located within approximately 2,000 feet of the Project Site. Alternative 4 would involve earthwork for subterranean parking and building footings with a maximum excavation depth of approximately 48 feet as compared to the maximum excavation depth

of approximately 45 feet for the Project. Additionally, Alternative 4 would involve approximately 505,000 cy of cut, as compared to the approximately 772,000 cy of cut for the Project. Therefore, like the Project, Alternative 4 has the potential to uncover previously unidentified paleontological resources. However, this potential would be less than under the Project due to the overall reduction in excavation as a result of the smaller footprint of new development. Nevertheless, Alternative 4 would also comply with the same regulatory requirements and implement the same mitigation measure (Mitigation Measure GEO-MM-1, set forth in Section IV.D, Geology and Soils, of this Draft EIR) as the Project in the event that paleontological resources are uncovered during ground disturbance activities. As such, due to the overall reduction in excavation, the potential to uncover previously unidentified paleontological resources would be less than significant with mitigation, and such impacts would be less than the less-than-significant-with-mitigation impacts of the Project.

e. Greenhouse Gas Emissions

(1) Construction

Under Alternative 4, the overall amount and duration of construction would increase in comparison to the Project (approximately 3,047,400 square feet under Alternative 4 versus 1,626,180 square feet under the Project), while approximately 37 percent less import/export of soil would occur during grading activities. Thus, construction of Alternative 4 would require less excavation and grading, but more building construction. As a result, GHG emissions over the construction duration under Alternative 4 would be less than significant and generally similar to the less-than-significant impacts of the Project.

(2) Operation

As discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, GHG emissions from a development project are determined in large part by the number of daily trips generated and the energy consumption associated with the proposed land uses. As discussed above, Alternative 4 would substantially increase the overall square footage when compared to the Project, and the proposed land uses would include a more energy-intensive use (i.e., residential dwelling units). Thus, the demand for electricity and natural gas under Alternative 4 would be greater than under the Project. In terms of petroleum-based fuel usage, the number of daily trips and corresponding GHG emissions generated by this alternative would be approximately 49 percent greater than the Project due to the increase in square footage and residential dwelling units. Thus, the amount of GHG emissions generated by Alternative 4 would be greater than under the Project. As with the Project, Alternative 4 would be designed to comply with the City's Green Building Ordinance, as applicable, and would incorporate sustainability features similar to those set forth in Project Design Features GHG-PDF-1 and GHG-PDF-2 to reduce GHG emissions.

Specifically, Alternative 4 would be designed to meet LEED Gold or equivalent green building standards, and rooftop solar panels would be provided on-site, similar to the Project. Overall, Alternative 4 would include the same amount of solar energy generating capacity as the Project. Furthermore, as with the Project, Alternative 4 would represent infill development within an urban area that is well served by public transportation and thus would contribute to an energy efficient land use pattern which would support the goals of the RTP/SCS intended to reduce GHG emissions. Therefore, Alternative 4, like the Project, would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 4 would be less than significant, but greater than the less-than-significant impacts of the Project.

f. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, hazardous materials, such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, would be used and, therefore, would require proper handling, management, and, in some cases, disposal. The management of any hazardous wastes could increase the opportunity for hazardous materials releases and, subsequently, the exposure of the public to hazardous materials. However, as discussed for the Project in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, all potentially hazardous materials under Alternative 4 would be used, stored, and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use.

With respect to existing conditions, as discussed in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, the Project Site is identified in multiple databases compiled pursuant to Government Code Section 65962.5. These listings collectively constitute a REC and CREC. In addition, like the Project, Alternative 4 would have the potential to encounter contaminated soils, soil gas, and impacted groundwater during construction. However, such potential would be reduced as compared to the Project due to the reduced development footprint and excavation activities under this alternative. Specifically, Alternative 4 would involve approximately 505,000 cy of cut with a maximum excavation depth of approximately 48 feet, compared to approximately 772,000 cy of cut and a maximum excavation depth of approximately 45 feet for the Project. Furthermore, due to the smaller excavation footprint and reduced excavation in areas where contaminated soil is anticipated to exist, Alternative 4 is estimated to require the removal of approximately 8,000 cy of contaminated soil as compared to approximately 60,000 cy under the Project. As with the Project, any contaminated soils, soil gas, or impacted soil and groundwater encountered would be treated and disposed of in accordance with applicable regulations and mitigation measures (Mitigation Measures HAZ-MM-1 and

HAZ-MM-2, set forth in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR) to reduce potential impacts to less-than-significant levels. These mitigation measures would include a soil management plan and subsurface gas controls.

Lastly, Alternative 4 would include design features similar to the Project to address the proper handling and disposal of ACMs or LBPs (specifically, Project Design Features HAZ-PDF-5 and HAZ-PDF-6). Overall, similar to the Project, impacts related to hazards and hazardous materials during construction of Alternative 4 would be less than significant with mitigation, and such impacts would be less than the less-than-significant-with-mitigation impacts of the Project.

(2) Operation

Operation of Alternative 4 would involve the use of limited quantities of potentially hazardous materials typical of those used in studio campuses and residential uses. Specifically, potentially hazardous materials typical of those used on studio campuses include paints, stains, adhesives, solvents and other materials used in set design and fabrication, fuels, pesticides for landscaping, cleaning and maintenance supplies, materials for pyrotechnic special effects, and other general products related to studio operations. Potentially hazardous materials typical of those used in residential uses include paints, pesticides for landscaping, cleaning and maintenance supplies, and other general products related to residential uses.

Since a lesser amount of studio uses would be developed than under the Project, Alternative 4 would involve less usage of potentially hazardous materials related to production activities. Notwithstanding, because Alternative 4 would result in a net increase of 2,952,690 square feet of floor area as compared to the Project's net increase of 1,130,320 square feet of floor area, Alternative 4 could involve a greater usage of potentially hazardous materials than the Project overall, specifically with regard to those related to residential uses. However, like the Project, all hazardous materials on the Project Site under Alternative 4 would be acquired, handled, used, stored, and disposed of in accordance with all applicable federal, state and local requirements. Project Design Features HAZ-PDF-1 through HAZ-PDF-6, set forth in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR calling for safety and emergency plans and training would be implemented, similar to the Project, and all necessary permits for filming activities and related operations would be obtained, as required. Such safety and emergency plans and training would include the Consolidated Contingency Plan, the Television Studios Emergency Action Plan, the Television Studios Safety Manual, and the Television Studios Injury and Illness Prevention Program. Additionally, like the Project, the Alternative 4 driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding Project Site access, thus providing adequate emergency access. Overall, impacts would be less than significant, and such impacts

would be greater than the less-than-significant impacts of the Project as a result of the overall increase in development and related increase in the use of potentially hazardous materials.

g. Hydrology and Water Quality

(1) Surface Water Hydrology

(a) Construction

Similar to the Project, construction activities for Alternative 4 would include the removal of some surface parking areas and new building construction. As previously discussed, construction of Alternative 4 would require less excavation compared to the Project. Alternative 4 would also disturb less surface area than the Project. Notwithstanding, as with the Project, these activities would have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Also similar to the Project, Alternative 4 would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, Alternative 4 would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. In addition, Alternative 4 would be required to comply with all applicable City grading permit regulations which establish the measures, plans, and inspections necessary to reduce sedimentation and erosion, similar to the Project. Thus, through compliance with all NPDES Construction General Permit requirements, including the preparation of a SWPPP, implementation of BMPs, and compliance with applicable City grading regulations, Alternative 4 would not alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, or flooding on- or off-site. Similarly, with adherence to standard compliance measures, construction activities would not cause flooding, substantially increase or decrease the amount of surface water flow from the Project Site into a water body or result in a permanent, adverse change to the movement of surface water. Therefore, construction-related impacts to surface water hydrology under Alternative 4 would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project due to the reduction in the development and excavation footprint.

(b) Operation

Alternative 4 would include the development of new buildings, paved areas, and landscaped areas. As with the Project, Alternative 4 would include up to approximately 90-percent impervious surfaces upon buildout. Accordingly, there would be no increase in runoff volumes into the existing storm drain system. Furthermore, as with the Project, Alternative 4's stormwater infrastructure would be designed to convey the 50-year storm to

the designated discharge location. Inlets within the Project Site would be sized to eliminate the potential for ponding. Accordingly, drainage within the Project Site during operation of Alternative 4 would be similar to existing conditions.

Based on the above, Alternative 4 would not impact the existing storm drain infrastructure serving the Project Site, and runoff would continue to follow the same discharge paths and drain to the same storm systems. Consequently, Alternative 4 would not cause flooding during a 50-year storm event, would not create runoff that would exceed the capacity of existing or planned drainage systems, would not require construction of new stormwater drainage facilities or expansion of existing facilities, would not substantially reduce or increase the amount of surface water in a water body, or result in a permanent adverse change to the movement of surface water. Therefore, operational impacts to surface water hydrology under Alternative 4 would be less than significant and such impacts would be similar to the less-than-significant impacts of the Project.

(2) Surface Water Quality

(a) Construction

Under Alternative 4, the degree to which new pollutants could be introduced to the Project Site during building construction would be increased compared to the Project, as Alternative 4 would include more construction activities over a longer duration due to the construction of 3,047,400 square feet of new floor area as compared to 1,626,180 square feet under the Project. However, Alternative 4 would involve less earthwork, with approximately 505,000 cy of cut, potentially 16,000 cy of imported fill, and up to approximately 505,000 cy of export, as compared to the estimated 772,000 cy of cut, up to 50,000 cy of imported fill, and up to approximately 772,000 cy of export required for the Project. Alternative 4 would require a maximum excavation depth of approximately 48 feet as compared to the maximum excavation depth of approximately 45 feet for the Project, and, therefore, could potentially require a temporary dewatering system during construction, similar to the Project. Like the Project, a SWPPP would be prepared for Alternative 4 and would specify BMPs to be used during construction.

With the implementation of site-specific BMPs included as part of the SWPPP, Alternative 4 would reduce or eliminate the discharge of potential pollutants from stormwater runoff. In addition, construction of Alternative 4 would be required to comply with City grading permit regulations, which establish the measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspections necessary to reduce sedimentation and erosion. With compliance with NPDES requirements and City grading permit regulations, construction of Alternative 4 would not result in discharges that violate any water quality standard or waste discharge requirements or otherwise substantially degrade water quality. Furthermore, construction

of Alternative 4 would not result in discharges that would cause regulatory standards to be violated in the Ballona Creek Watershed. Therefore, as with the Project, construction-related impacts to surface water quality under Alternative 4 would be less than significant. Given the increased building construction activity but the reduced earthwork, such impacts would be generally similar overall to the less-than-significant impacts of the Project.

(b) Operation

As is typical of most urban developments, stormwater runoff from the Project Site has the potential to introduce pollutants such as sediment, nutrients, pesticides, metals, pathogens, oil, and grease into the stormwater system. Due to the increase in floor area and associated activities on-site, Alternative 4 could generate more of these types of pollutants than the Project. However, similar to the Project, Alternative 4 would implement BMPs for managing stormwater runoff in accordance with the City's LID Ordinance requirements. The BMPs would control stormwater runoff such that no increase in runoff volumes over existing conditions would result from the alternative. As with the Project, Alternative 4 would include the installation of a capture and use system (or other biofiltration/bioretention system) for irrigation purposes, consistent with LID requirements, to reduce the quantity and improve the quality of rainfall runoff from the Project Site. With the incorporation of the LID BMPs, operation of Alternative 4 would not result in discharges that would violate any water quality standard or waste discharge requirements or otherwise substantially degrade water quality. Thus, as with the Project, impacts to surface water quality during operation of Alternative 4 would be less than significant, and such impacts would be greater than the less-than-significant impacts of the Project due to the increase in development.

(3) Groundwater Hydrology

(a) Construction

As previously discussed, as with the Project, Alternative 4 could require a temporary dewatering system during construction, which would be installed and operated in accordance with NPDES General Construction Permit requirements. Any discharge of groundwater during construction of Alternative 4 would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements. As discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, no water supply wells are located at the Project Site or within 1 mile of the Project Site that could be impacted by construction. In addition, as with the Project, Alternative 4 would not include the construction of water supply wells. Therefore, construction impacts on groundwater hydrology during construction of Alternative 4 would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project due to the overall reduction in excavation activities.

(b) Operation

As with the Project, the subterranean parking proposed under Alternative 4 would be designed to withstand hydrostatic forces and would incorporate comprehensive waterproofing systems in accordance with industry standards and construction methods. As such, similar to the Project, permanent dewatering operations are not expected during operation of Alternative 4. As discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, the Project Site is currently 90 percent impervious, and, as such, minimal groundwater recharge occurs. Similar to the Project, Alternative 4 would continue to be comprised of up to approximately 90 percent impervious surfaces following buildout. Therefore, impacts to groundwater hydrology during operation of Alternative 4 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(4) Groundwater Quality

(a) Construction

Similar to the Project, Alternative 4 could require dewatering during construction, which would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements. Pursuant to such requirements, any extracted groundwater would be chemically analyzed to determine the appropriate treatment and/or disposal methods.

During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would, therefore, require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials to be released into groundwater. As this alternative would require more construction activities for a longer duration when compared to the Project, the use of hazardous materials would increase.

In addition, like the Project, Alternative 4 would have the potential to encounter contaminated soils, soil gas, and impacted soil and groundwater during construction. However, this potential would be reduced as compared to that of the Project due to the smaller excavation footprint and reduced excavation in areas where contaminated soil is anticipated to exist. Specifically, Alternative 4 is estimated to require the removal of approximately 8,000 cy of contaminated soil as compared to approximately 60,000 cy under the Project. Furthermore, Alternative 4 would implement the same mitigation measures (Mitigation Measures HAZ-MM-1 and HAZ-MM-2, set forth in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR) as the Project, including a soil management plan and subsurface gas controls, to ensure that potential impacts related to the exposure or release of subsurface gases and impacted soil and groundwater are less than significant. In addition, compliance with all applicable federal, state, and local

requirements concerning the handling, storage, and disposal of hazardous waste would reduce the potential for the construction of Alternative 4 to release contaminants into groundwater that could affect the rate or direction of movement of existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well downstream. Lastly, as there are no groundwater production wells or public water supply wells on-site or within 1 mile of the Project Site, construction activities would not affect existing wells.

Based on the above, impacts with respect to groundwater quality during construction under Alternative 4 would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project due to the reduction in earthwork, and in particular the amount of potentially contaminated soil to be removed, as compared to the Project.

(b) Operation

Operational activities that could affect groundwater quality include spills of hazardous materials. In accordance with City requirements, source control measures, including good housekeeping, removal of trash and maintenance of driveways and parking areas, and proper use and storage of pesticides, would reduce water quality impacts and prevent pollutants from entering the groundwater by percolation within landscaped areas or other permeable surfaces. Alternative 4 is not anticipated to result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise reach groundwater through percolation. Furthermore, there are currently no USTs within the Project Site, and no new USTs would be installed as part of the alternative. Therefore, as with the Project, impacts with respect to groundwater quality during operation of Alternative 4 would be less than significant, and such impacts may be somewhat greater than the less-than-significant impacts the Project due to the increase in development and the associated use of hazardous materials.

h. Land Use and Planning

Alternative 4, the Mixed-Use Alternative, would involve a combination of studio, residential, and retail uses. Alternative 4 would provide a total of 3,696,370 square feet of development, including 2,772,000 square feet of residential uses and 924,370 square feet of studio and commercial uses. Alternative 4 assumes the construction of 3,047,400 square feet of new development, the demolition of 94,710 square feet of existing studio-related uses, and the retention of 648,970 square feet of existing studio-related uses. New construction would include 2,772,000 square feet of residential uses, 36,000 square feet of sound stages, 41,400 square feet of production support, 138,000 square feet of general

office uses, and 60,000 square feet of retail uses. The sitewide FAR would be 3.45:1, while the commercial FAR would be 0.86:1, and the residential FAR would be 2.59:1.[25] The residential uses would include 3,680 units within three residential towers, with a mix of studios (734 units), one-bedroom units (1,834 units), two-bedroom units (1,100 units), and three-bedroom penthouse units (12 units), of which 14 percent (516 units) would be affordable units for Very Low-Income households. This would represent a density bonus of 35 percent in lieu of the maximum 70 percent increase permitted under TOC Tier 3.

Like the Project, Alternative 4 would include the adoption of a Specific Plan and an associated General Plan Amendment and Zone Change, establishment of a Sign District, a Vesting Tentative Tract Map, and a Development Agreement. Alternative 4 would also include a TOC Affordable Housing Incentive Program Compliance Review for a qualifying Tier 3 project. In addition, the unincorporated County parcel would be annexed to the City. Similar height zones as under the Project would be established, although the maximum height limit in Height Zone C along Fairfax Avenue and Beverly Boulevard would be increased from 160 feet to 400 feet to accommodate the residential towers.[26]

With approval of the requested land use entitlements, Alternative 4 would not conflict with the applicable plans, policies, and regulations that were adopted for the purpose of avoiding or mitigating an environmental effect, including, but not limited to, the City's General Plan Framework Element, Wilshire Community Plan, LAMC, and SCAG's 2020–2045 RTP/SCS.

In addition, Alternative 4 would not conflict with the Housing Element of the General Plan. Specifically, Alternative 4 would provide a variety of housing sizes in an area that is pedestrian-friendly and served by public transit. Alternative 4 would also support Housing Element Objective 3.2 to promote the construction of sustainable buildings by incorporating sustainable design features, including energy conservation, water conservation, a pedestrian- and bicycle-friendly site design, and waste reduction measures. The proposed residential component would promote a more livable neighborhood, with a mix of housing, retail, and quality design. Therefore, Alternative 4 would not conflict with the applicable goals, objectives, and policies set forth in the Housing Element.

With regard to open space requirements, per LAMC Section 12.21 G, based on the residential unit mix, Alternative 4 would be required to provide nearly 500,000 square feet of open space as well as 920 trees. As part of the design of the apartment building, a

[25] Based on the Project Site's location in a Tier 3 TOC, an FAR of up to 3.75:1 would be permitted.

[26] While there are no height limits under the existing zoning regulations for the Project Site, height limits would be imposed by the Specific Plan.

maximum of approximately 184,000 square feet of private open space could be provided through balconies, patios, etc., with additional open space being located within recreational rooms and a portion of the approximately 90,000 square-foot rooftop area. However, a minimum of 50 percent of the required open space is required to be provided as common open space. This requirement equates to approximately 250,000 square feet of common open space. To help meet these requirements, residential balconies, rooftop open space, three fitness centers, and an approximately 35,000 square-foot common open space area would be provided at the ground level. Nonetheless, it is unlikely that Alternative 4 would be able to fully meet the open space criteria required by LAMC Section 12.21 G, or provide for a location suitable for the planting of 920 trees on-site without jeopardizing the function of the studio uses and associated operations or requiring significant variances beyond those allowed through the Transit Oriented Communities program to reduce the required amount of open space.

Based on the foregoing, the impacts of Alternative 4 related to potential conflicts with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant, and such impacts would be generally similar to the less-than-significant impacts of the Project. It is noted, however, that Alternative 4 would result in substantially increased building heights and overall density than the Project, which could be greater than the predominantly low- and mid-rise land uses in the surrounding area. Additionally, Alternative 4 would be not likely meet its open space requirement.

i. Noise

(1) Noise

(a) Construction

The construction activities and associated equipment under Alternative 4 would be greater than under the Project due to the increase in new floor area and the introduction of residential uses. As with the Project, construction of Alternative 4 would generate noise from the use of heavy-duty construction equipment, as well as from haul truck and construction worker trips. Alternative 4 is also expected to involve a similar number of haul truck trips on peak construction days (i.e., 300 haul trucks or 600 trips). However, construction of the residential towers would require more finishing work and an associated increase in construction workers on-site, as well as more deliveries. Therefore, on-site construction noise levels under Alternative 4 would be higher than those of the Project due to the increase in total floor area and construction of the residential towers. As such, noise levels on maximum activity days, which are used for measuring impact significance, would be higher as compared to the Project. As with the Project, Alternative 4 would implement the same Project design features and mitigation measures (Project Design Features NOI-PDF-1 through NOI-PDF-5 and Mitigation Measure NOI-MM-1, set forth in Section

IV.I, Noise, of this Draft EIR) as the Project, which would minimize construction noise. Nonetheless, on- and off-site construction noise impacts (both project-level and cumulative) would be significant and unavoidable under Alternative 4, and such impacts would be greater than the Project's significant and unavoidable impacts since on-site noise levels on maximum activity days would be higher.

(b) Operation

As discussed in Section IV.I, Noise, of this Draft EIR, sources of operational noise under the Project would include on-site stationary noise sources, including mechanical equipment, activities within the proposed outdoor spaces (i.e., outdoor roof decks and outdoor studio production activities), parking facilities, loading docks and trash compactors; and off-site mobile (roadway traffic) noise sources. Alternative 4 would introduce similar noise sources as the Project. However, it is anticipated that with the overall increase in total floor area and new residential uses under this alternative, plus the associated increase in population on-site, the noise levels from building mechanical equipment, use of outdoor spaces, and parking facilities would increase. Alternative 4 would implement design features similar to Project Design Feature NOI-PDF-3 (acoustic screening of mechanical equipment), Project Design Feature NOI-PDF-4 (controls on amplified sound), and Project Design Feature NOI-PDF-5 (limits on outdoor studio production within 200 feet of the Shared Eastern Property Line), which would minimize on-site operational noise. Thus, operational on-site noise impacts under Alternative 4 would be less than significant, but greater than the less-than-significant impacts of the Project.

With regard to operational off-site (traffic) noise, Alternative 4 would generate more operational traffic than the Project due to the increase in development plus residential uses (i.e., 23,030 daily trips under Alternative 4 versus 13,454 daily trips under the Project). This increase in vehicle trips would result in an increase in off-site operational traffic-related noise levels under Alternative 4. Typically, a doubling of traffic volumes would result in an increase of 3 dBA. However, when accounting for existing traffic levels in the area, the increase in daily trips under Alternative 4 would result in a maximum increase of 0.3 dBA and 0.2 dBA in off-site traffic noise levels along the roadway segments of Fairfax Avenue (between 6th Street and Wilshire Boulevard) and Beverly Boulevard (between Genesee Avenue and Stanley Avenue), respectively, as compared to the Project. Therefore, impacts from off-site noise during operation of Alternative 4 would remain less than significant but would be greater than the less-than-significant impacts of the Project.

Given the greater operational noise levels under Alternative 4, a qualitative analysis of composite noise levels taking into consideration all operational activities was performed. Like the Project, impacts associated with composite noise levels during operation of Alternative 4 would be less than significant. Cumulative operational on- and off-site noise impacts would also be less than significant. However, all of these impacts would be

greater under Alternative 4 when compared to the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

The general types of construction activities and associated equipment under Alternative 4 would be similar to the Project, although construction of the residential towers would require more finishing work. While the overall amount and duration of construction activities would be greater under Alternative 4, the on- and off-site construction-related vibration levels would be similar to those of the Project since construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment. Alternative 4 is also expected to involve a similar number of haul truck trips on peak construction days (i.e., 300 haul trucks or 600 trips). As such, peak vibration levels generated by construction equipment and construction truck trips under Alternative 4 would be similar to those of the Project. Accordingly, as with the Project, construction activities under Alternative 4 would result in significant and unavoidable on- and off-site vibration impacts with respect to human annoyance and less-than-significant on- and off-site vibration impacts with respect to building damage. Such impacts would be similar to the Project's less-than-significant impacts, although the duration of such impacts would be longer due to the increase in building footprint and associated construction activities.

(b) Operation

As described in Section IV.I, Noise, of this Draft EIR, sources of vibration related to Project operations would include vehicle circulation, delivery trucks, and building mechanical equipment. These same sources of operational vibration would occur under Alternative 4. As with the Project, vehicular-induced vibration from Alternative 4, including vehicle circulation within the subterranean parking areas, would not generate perceptible vibration levels at off-site sensitive uses. In addition, as with the Project, building mechanical equipment installed as part of Alternative 4 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include vibration-attenuation mounts to reduce vibration transmission such that the vibration would not be perceptible at any off-site sensitive receptors. Therefore, as with the Project, operation of Alternative 4 would not increase vibration levels in the immediate vicinity of the Project Site. As such, vibration impacts associated with operation of Alternative 4 would be less than significant but slightly greater than the Project's less-than-significant impacts due to the increase in vehicle trips and floor area under this alternative.

j. Public Services

(1) Fire Protection

(a) Construction

The types of construction activities required for Alternative 4 would be similar to those of the Project, although the overall amount of development, associated construction activities and construction traffic, and the duration of construction would be greater. Like the Project, construction under Alternative 4 would occur in compliance with all applicable federal, state, and local requirements concerning fire prevention and hazardous materials, which would effectively reduce the potential for construction-related fire and explosion. Additionally, similar to the Project, Alternative 4 would maintain travel lanes on all streets around the Project Site throughout the construction period and implement a Construction Traffic Management Plan, which would include provisions for maintaining emergency access during construction. Furthermore, emergency vehicles have the ability to avoid traffic delays through the use of sirens to clear paths of travel in accordance with the CVC. Therefore, construction of Alternative 4, like the Project, would not result in the need for new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 4 would be less than significant; however, such impacts would be greater than the less-than-significant impacts of the Project due to the increase in construction activity.

(b) Operation

Alternative 4 would generate a new residential population, as well as a new visitor and employee population on the Project Site that would contribute to an increased demand for LAFD fire protection services. Alternative 4 would generate approximately 8,750 new residents and an estimated 3,337 new employees, creating a total service population of 12,087 people, which is greater than the Project's service population of approximately 7,832 employees.[27]

Similar to the Project, Alternative 4 would comply with all applicable City Building Code and Fire Code requirements regarding structural design, building materials, Project Site access, fire flow, storage and management of hazardous materials including pyrotechnical supplies, alarm and communications systems, life safety features (e.g., automatic fire sprinkler systems, fire service access elevators, etc.) and would undergo LAFD fire/life safety plan review to ensure compliance with the above, which would reduce the demand for fire protection and emergency medical services and also ensure adequate

[27] LADOT and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, Version 1.3, July 2020.[Also cite the Alternative 4 VMT calculator documentation]

emergency access. Furthermore, as with the Project, traffic generated by Alternative 4 would not significantly impact emergency vehicle response to the Project Site and surrounding area as the drivers of emergency vehicles have the ability to bypass traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Given its density, Alternative 4 would be expected to have the same fire flow requirement as the Project (6,000 to 9,000 gpm from four to six hydrants flowing simultaneously for the Industrial and Commercial land use category), and, thus, LADWP would be able to supply sufficient flow and pressure to satisfy the fire suppression needs. Furthermore, the existing helipad would be retained in approximately the same location on the Project Site.

Alternative 4 would also generate General Fund tax revenues for the City that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate. Therefore, even with a greater overall demand on LAFD services when compared to the Project, it is assumed that operation of Alternative 4, like the Project, would not result in the need for new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 4 would be less than significant and greater than the less-than-significant impacts of the Project due to the increase in floor area and associated service population.

(2) Police Protection

(a) Construction

As discussed above, the types of construction activities under Alternative 4 would be similar to those of the Project; however, the overall amount of development, associated construction activities and construction traffic, and the duration of construction would be greater than under the Project. Notwithstanding, similar to the Project, construction would not generate a permanent population on the Project Site that would substantially increase the police service population of the Wilshire Community Police Station. In addition, fencing or walls would be used to provide a secure Project Site perimeter, and access would continue to be controlled via staffed guard houses, similar to both existing conditions and the Project. Therefore, as with the Project, construction of Alternative 4 would not contribute to a temporary increased demand for police protection services. With continued implementation of these security measures, the potential demand on police protection services at the Project Site associated with theft and vandalism during construction would be reduced.

Also like the Project, Alternative 4 would implement a Construction Traffic Management Plan to ensure the continued provision of emergency access during construction. Additionally, pursuant to CVC Section 21806, emergency vehicles can use their sirens to clear a path of travel or drive in the lanes of opposing traffic during an

emergency to avoid traffic. Therefore, as with the Project, construction of Alternative 4 would not result in the need for new or altered government facilities (i.e., police stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 4 would be less than significant, and such impacts would be greater than the less-than-significant impacts of the Project due to the increase in construction activity.

(b) Operation

Alternative 4 would generate a new residential population, as well as a new visitor and employee population on the Project Site that would contribute to an increased demand for police protection services. Specifically, Alternative 4 would generate approximately 8,750 new residents and an estimated 3,337 new employees, creating a total service population of 12,087, as compared to the Project's service population of approximately 7,832 employees.

As LAPD evaluates service needs based on the residential service population and the associated officer-to-resident ratio, based on its residential population, Alternative 4 would generate a greater demand for LAPD services compared to the Project and result in a lower officer-to-resident ratio. Like the Project, Alternative 4 would implement similar Project design features (Project Design Features POL-PDF-1 through POL-PDF-1 in Section IV.J.2, Public Services—Police Protection, of this Draft EIR), including a private on-site security staff and regular security patrols, which would help reduce the demand for police services. Alternative 4 would also generate General Fund tax revenues for the City which could be used to expand law enforcement resources in the Wilshire Division. In addition, as discussed above, fencing or walls would be used to provide a secure Project Site perimeter, and access would be controlled via staffed guard houses. With continued implementation of these security measures, the potential demand on police protection services at the Project Site during operation would be reduced.

Therefore, even with a greater overall demand on LAPD services when compared to the Project, it is assumed that operation of Alternative 4, as with the Project, would not result in the need for new or altered government facilities (i.e., police stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 4 would be less than significant, and such impacts would be greater than the less-than-significant impacts of the Project due to the introduction of a residential population.

k. Transportation

Transportation impacts associated with Alternative 4 are addressed in the Alternatives Traffic Memo provided in Appendix P of this Draft EIR. As discussed therein,

the transportation-related plans, policies, and programs applicable to the Project would also apply to Alternative 4. As with the Project, this alternative would not interfere with the complete streets balanced transportation network (i.e., Transit-Enhanced Network, Bicycle Enhanced Network, and Pedestrian-Enhanced Districts) concept of the Mobility Plan and would enhance pedestrian access within and around the Project Site as called for by the Mobility Plan and the Wilshire Community Plan. The alternative would also prioritize safety and access for all individuals utilizing the Project Site by complying with all ADA requirements as required by the LAMC; include sidewalk and driveway design, vehicular parking, bicycle parking, etc., in accordance with LAMC requirements; and represent urban infill development within a TPA and HQTA in close proximity to transit which would encourage alternative transportation use as called for by the Mobility Plan and 2020–2045 RTP/SCS. Alternative 4 would support these transportation plans for the same reasons as the Project and would include a Mobility Hub, similar roadway and sidewalk improvements, sufficient parking, etc. Alternative 4 would also implement a TDM Program to reduce VMT, as called for by the Mobility Plan, Wilshire Community Plan, 2020–2045 RTP/SCS, and the City's TDM Ordinance.

Furthermore, as discussed in Section IV.K, Transportation, of this Draft EIR, Fairfax Avenue and Beverly Boulevard adjacent to the Project Site and West 3rd Street to the south are identified as part of the Vision Zero's High Injury Network. As with the Project, it is assumed Alternative 4 would include the Project's off-site Vision Zero safety improvements, including bus stop improvements along the Project Site perimeter along Fairfax Avenue and Beverly Boulevard, which would include adequate benches, shelters, lighting, LED displays, and signage to the extent feasible under the City of Los Angeles' current bus shelter contract; and a financial contribution toward the funding of pedestrian facilities and safety improvements within the area. The alternative's improvements to the pedestrian environment would not preclude future Vision Zero safety improvements by the City. Additionally, as with the Project, the Project Applicant would contribute to signal improvements at nearby intersections, as required by LADOT.

Therefore, as with the Project, Alternative 4 would not conflict with a program, plan, ordinance, or policy addressing the circulation system. Impacts would be less than significant and similar to the less-than-significant impacts of the Project.

With respect to VMT, Alternative 4 would generate a lower total work VMT and work VMT per employee than the Project. Specifically, Alternative 4 would generate an estimated 21,246 daily work VMT (compared to 52,194 daily work VMT under the Project) and an average work VMT per employee of 6.4 (compared to 6.7 under the Project), which would be below the work VMT per employee significance threshold for the Central APC of 7.6. However, in contrast to the Project, Alternative 4 includes residential uses and thus would produce household VMT. Alternative 4 would generate an estimated 38,773 daily household VMT and an average household VMT per capita of 4.4, which would be below

the average daily household VMT per capita significance threshold of 6.0 for the Central APC. Therefore, as with the Project, Alternative 4 would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b), regarding VMT, and impacts would be less than significant. While Alternative 4 would generate a lower total work VMT and work VMT per employee than the Project, overall Alternative 4 would have a greater VMT impact than the Project because it would generate an estimated total 141,783 VMT compared to an estimated total 95,865 VMT for the Project.

Regarding freeway safety, as discussed in the Alternatives Traffic Memo, Alternative 4 would not add 50 feet or more to queues on the US-101 southbound off-ramp at Highland Avenue during either peak hour and, thus, would not exceed the ramp storage length. Alternative 4 would generate an estimated 40 morning peak-hour trips and 49 afternoon peak-hour trips on the US-101 southbound off-ramp at Highland Avenue, as compared to the Project's estimated 42 morning peak-hour trips and 16 afternoon peak-hour trips on the off-ramp. Therefore, like the Project, Alternative 4 would neither be subject to speed differential analyses nor cause a significant freeway safety impact. Impacts related to freeway safety would be less than significant, and such impacts would be greater overall than the less-than-significant impacts of the Project.

I. Tribal Cultural Resources

As previously discussed, Alternative 4 would require earthwork within a smaller footprint than the Project and a maximum excavation depth of approximately 48 feet as compared to the maximum excavation depth of approximately 45 feet for the Project. Alternative 4 would involve approximately 505,000 cy of cut, compared to the approximately 772,000 cy of cut under the Project. Therefore, like the Project, Alternative 4 has the potential to uncover previously unidentified tribal cultural resources. However, this potential would be less than the Project's due to the overall reduction in excavation as a result of the smaller footprint of new development. As discussed in Section IV.L, Tribal Cultural Resources, of this Draft EIR, no tribal cultural resources have been previously recorded at the Project Site. Nonetheless, Alternative 4 would implement the City's standard Condition of Approval for the inadvertent discovery of tribal cultural resources, which would ensure that any impacts to tribal cultural resources that may be encountered during construction would remain less than significant. Therefore, impacts under Alternative 4 related to tribal cultural resources would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project due to the reduced earthwork volume and footprint.

m. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities for Alternative 4 would result in a temporary water demand for dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. Despite the increase in floor area and construction activity, construction-related water use under Alternative 4 would be less than under the Project due to the overall reduced amount of excavation activities as a result of the smaller footprint of new development. Furthermore, while Alternative 4 would require trenching for connection to the existing water mains in the adjacent streets similar to the Project, Alternative 4 would similarly implement a Construction Traffic Management Plan to ensure the safe and efficient flow of pedestrian and vehicular traffic around the Project Site during construction. As such, as with the Project, Alternative 4 would not result in construction activities that require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental impacts. Therefore, impacts under Alternative 4 related to water supply and infrastructure during construction would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project.

(b) Operation

As with the Project, Alternative 4 would result in an increase in long-term water demand. In addition, based on the increase in total development as compared to the Project and the introduction of residential uses, water demand for Alternative 4 would be greater than the Project's water demand. Specifically, the water demand for Alternative 4 would be an estimated 563,873 gpd, as compared to the Project's water demand of an estimated 313,176 gpd under the proposed development program.[28]

Despite the higher demand, based on the projected water demand estimates for LADWP's service area from the 2020 UWMP (discussed in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR), Alternative 4 would represent a miniscule proportion (less than 0.1 percent) of LADWP's projected water demand and supply in 2025 (the closest projection year to buildout), similar to the Project. Furthermore, as outlined in its 2020 UWMP, LADWP is committed to providing a reliable water supply for the City. The 2020 UWMP takes into account climate change and the concerns of drought and dry weather and notes that the City of Los Angeles will meet all

[28] The Project could generate a maximum estimated water demand of 313,785 gpd under the proposed land use exchange program.

new demand for water due to the projected population growth by expanding local water supply programs and reducing demands on purchased imported water. The 2020 UWMP also furthers the goals of the Green New Deal, addresses the current and future State Water Project (SWP) supply shortages, and concludes that Metropolitan Water District's (MWD's) actions in response to the threats to the SWP will ensure the continued reliability of its water deliveries. By focusing on demand reduction and alternative sources of water supplies, LADWP will further ensure that long-term dependence on MWD supplies will not be exacerbated by potential future shortages. Additionally, as reaffirmed in the Green New Deal, the City is committed to conserving and recycling water to help meet future water demands in the City.

Thus, as with the Project, the estimated water demand under Alternative 4 is expected to be met by LADWP's projected water supplies, including in normal, single-dry, and multi-dry years.

Furthermore, similar to the Project, Alternative 4 would implement all necessary on-site infrastructure and connections to the LADWP water system pursuant to applicable City requirements. Specifically, similar to the Project, new domestic services would be expected to connect from the existing 12-inch water line in Fairfax Avenue and the eight-inch water line in Beverly Boulevard. As discussed in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, fire flow demands have a much greater instantaneous impact on infrastructure than operational demand and thus are the primary means for analyzing infrastructure capacity. As discussed above, Alternative 4 would be expected to have the same fire flow requirement as the Project (6,000 to 9,000 gpm from four to six hydrants flowing simultaneously), which could be adequately accommodated by the existing water distribution system in the Project area. Thus, the existing infrastructure would be sufficient to meet the estimated water demand of Alternative 4.

Therefore, impacts under Alternative 4 related to water supply and infrastructure during operation would be less than significant, and such impacts would be greater than the less-than-significant impacts of the Project due to the increased water demand.

(2) Wastewater

(a) Construction

Limited and temporary wastewater generation may occur incrementally throughout construction of Alternative 4, and wastewater flows would be greater than the Project's due to the overall increase in development and associated increased number of construction workers. Such flows would be temporary and relatively minimal and thus could be accommodated by the existing infrastructure which has sufficient capacity to serve the

Project. In addition, construction workers would typically utilize portable restrooms, which would not contribute directly to the wastewater system that serves the Project Site but would eventually be treated at the HWRP, which has ample available capacity. As with the Project, new sewer line connections would be required to connect the proposed buildings to the main sewer infrastructure system in the streets surrounding the Project Site. Construction impacts associated with new connections would primarily be confined to trenching for the placement of pipe and connection into the existing main sewer lines, and any off-site work that could potentially affect existing sewer service to adjacent properties would be coordinated with the BOE. As such, Alternative 4, like the Project, would not require or result in the relocation or construction of new or expanded wastewater facilities, the construction or relocation of which could cause significant environmental effects during the construction period. Therefore, similar to the Project, impacts under Alternative 4 related to wastewater during construction would be less than significant, and such impacts would be slightly greater than the less-than-significant impacts of the Project due to the overall increase in development.

(b) Operation

As with the Project, operation of Alternative 4 would increase wastewater flows from the Project Site. In addition, based on the increase in total floor area and the introduction of residential uses, operational wastewater generation under Alternative 4 would be greater than under the Project. Specifically, wastewater generation for Alternative 4 is estimated to be 641,680 gpd, as compared to the Project's estimated wastewater generation of 261,785 gpd under the conceptual development scenario.[29]

As provided in Section IV.M.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the wastewater generated during Project operation could be accommodated by the existing remaining capacity of the HWRP. The HWRP has a capacity of 450 mgd, and current average wastewater flows are approximately 275 mgd. Accordingly, the remaining available capacity at the Hyperion Treatment Plant is approximately 175 mgd, which would be sufficient to accommodate Alternative 4's wastewater flows.

Regarding wastewater conveyance (sewer) capacity, as discussed in Section IV.M.2, Utilities and Service Systems—Wastewater, of this Draft EIR, sewer service for the Project would be provided utilizing new or existing on-site sewer connections to the existing off-site sewer lines in the adjacent streets. Based on data in the Wastewater Service Information (WWSI) prepared for the Project (included in the Utility Report provided in Appendix O) and calculations performed by KPFF Consulting Engineers, the existing sewer

[29] The Project could generate maximum estimated wastewater flows of 262,160 gpd under the proposed land use exchange program.

mains in Fairfax Avenue may experience flow levels (measured as depth/diameter [d/D] and calculated as a percentage) between 50 and 75 percent d/D with buildout of Alternative 4, which is above the allowable 50 percent d/D. However, as discussed in the Utility Report, based on the City of Los Angeles Sewer Design Manual Part F, the trigger flow in a sanitary sewer that would initiate planning for a relief or replacement sewer is when the depth of flow reaches three-fourths of the pipe diameter or a d/D of 75 percent. Alternatively, similar to the Project, Alternative 4's wastewater flows could be directed to a combination of the sewer line along the southern property line (which connects to a 12-inch main in Fairfax Avenue) and the line in Beverly Boulevard (which runs to a primary line in La Cienega Boulevard). As with the Project, additional detailed gauging and evaluation would be conducted for Alternative 4, as required by LAMC Section 64.14, to obtain final approval of a sewer capacity and connection permit during the permitting process. Furthermore, like the Project, all sanitary sewer connections and on-site infrastructure under Alternative 4 would be designed and constructed in accordance with applicable regulatory standards. While sewer line upgrades would not be expected for Alternative 4, the City could potentially require the upsizing of one or more local lines during the permitting process. Based on the above, operation of Alternative 4, as with the Project, would not be expected to require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. Therefore, impacts under Alternative 4 related to wastewater during operation would be less than significant, and such impacts would be greater than the less-than-significant impacts of the Project.

(3) Electric Power, Natural Gas, and Telecommunications Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 4 would consume minor quantities of electricity (construction activities do not typically involve the consumption of natural gas or use of hard-wired telecommunications facilities). The energy consumed during construction of Alternative 4 would be greater than under the Project due to the increase in floor area, associated construction activities, and the duration of construction. Furthermore, because the Project Site is an urban infill site that is already served by energy infrastructure, like the Project, it is anticipated that Alternative 4 would not require the construction of off-site energy infrastructure improvements. Lastly, like the Project, Alternative 4 would be required to coordinate energy infrastructure improvements with LADWP and SoCalGas and develop on-site energy infrastructure and connections to the existing off-site energy infrastructure in accordance with applicable regulatory requirements. Hence, like the Project, construction activities under Alternative 4 would not result in an increase in energy demand that exceeds available distribution infrastructure capabilities that would require the construction of new or expanded energy facilities, the construction of which could cause significant environmental effects. Therefore, impacts on

energy and telecommunications infrastructure associated with short-term construction activities under Alternative 4 would be less than significant and greater than the less-than-significant impacts of the Project due to the increase in development and longer duration of construction activities.

(b) Operation

As with the Project, operation of Alternative 4 would increase the demand for electricity, natural gas, and telecommunications relative to existing conditions. Alternative 4 operations would result in more demand than the Project due to substantially more floor area. Hence, Alternative 4 would result in increased operational impacts on energy and telecommunications infrastructure when compared to the Project. As discussed in the Utility Report, LADWP and SoCalGas have confirmed that the existing energy infrastructure in the area is sufficient to serve the Project. Although Alternative 4 would result in greater operational energy demand than the Project, the existing energy infrastructure in the area is expected to be adequate to serve Alternative 4. Similarly, private telecommunications providers would be expected to expand service capacities as needed to meet demand. Therefore, as with the Project, Alternative 4 operation would not result in an increase in energy or telecommunications demand that exceeds available distribution infrastructure capabilities that would require the construction of new or expanded facilities, the construction of which could cause significant environmental effects. Impacts on energy and telecommunications infrastructure under Alternative 4 would be less than significant and greater than the less-than-significant impacts of the Project.

3. Comparison of Impacts

Alternative 4 would not avoid the Project-level and cumulative significant and unavoidable impacts with respect to regional construction emissions; regional emissions associated with concurrent construction and operations; Project-level and cumulative on- and off-site noise during construction; and Project-level on-site vibration and Project-level and cumulative off-site vibration (based on the significance threshold for human annoyance) during construction. These impacts would continue to be significant and unavoidable under Alternative 4. The duration of the construction noise and vibration impacts, and the concurrent construction and operational regional air quality impacts would increase due to the increase in building footprint and overall construction activities. The duration of the regional air quality impact during construction would decrease due to the reduction in overall grading. Moreover, the significant and unavoidable impacts with respect to regional emissions associated with concurrent construction and operations and on- and off-site construction noise would be greater under Alternative 4. In addition, regional operational emissions of VOCs and NOx under Alternative 4 would result in new significant and unavoidable air quality impacts that would not occur under the Project.

Alternative 4 would reduce some of the less-than-significant-with-mitigation impacts associated with the Project, specifically archaeological resources, paleontological resources, and hazards and hazardous materials during construction. Alternative 4 would also result in similar less-than-significant-with-mitigation impacts as the Project with regard to localized emissions during construction and geologic hazards.

In addition, Alternative 4 would result in greater less-than-significant impacts than the Project, including localized air emissions and TACs during operation, GHG emissions during operation, hazards and hazardous materials during operation, surface water quality and groundwater quality during operation, operational noise and vibration, fire protection, police protection, VMT, freeway safety, water supply and infrastructure during operation, wastewater, and energy and telecommunications infrastructure. In addition, Alternative 4 would result in substantially increased building heights and overall density than the Project, which could be considered incompatible with the predominantly low- and mid-rise land uses in the surrounding area. Furthermore, although not considered significant impacts on the environment, Alternative 4 would result in greater aesthetic and shading impacts than the Project.

Alternative 4 would result in similar less-than-significant impacts as the Project with regard to TACs during construction, historical resources; energy, GHG emissions during construction, surface water and groundwater hydrology during operation, surface water quality during construction, land use and planning, and consistency with transportation plans, programs, and policies.

Alternative 4 would reduce several of the less-than-significant impacts associated with the Project, specifically surface water hydrology during construction, groundwater hydrology and quality during construction, tribal cultural resources, and water supply and infrastructure during construction.

4. Relationship of the Alternative to Project Objectives

Alternative 4, the Mixed-Use Alternative, would involve a combination of studio, residential, and retail uses. Alternative 4 would provide a total of 3,696,370 square feet of development, including 2,772,000 square feet of residential uses and 924,370 square feet of studio/commercial uses consisting of 36,000 square feet of sound stages, 41,400 square feet of production support, 138,000 square feet of general office uses, and 60,000 square feet of retail uses. The sitewide FAR would be 3.45:1, while the commercial FAR would be 0.86:1, and the residential FAR would be 2.59:1. The residential uses would include 3,680 units within three residential towers, with a mix of studios (734 units), one-bedroom units (1,834 units), two-bedroom units (1,100 units), and three-bedroom penthouse units

(12 units), of which 14 percent (516 units) would be affordable units for Very Low-Income households.

Alternative 4 would include a Specific Plan and Sign District similar to those of the Project, and similar height zones would be established. However, the maximum height limit in Height Zone C along Fairfax Avenue and Beverly Boulevard would be increased from 160 feet to 400 feet to accommodate the residential towers.[30] Alternative 4 would also include a Mobility Hub and the same frontage areas, building stepbacks, general landscape plan, and streetscape improvements as the Project. Additionally, the Viewshed Restoration Area would be converted to basecamp uses, as under the Project.

Given the mixed-use nature of this alternative, Alternative 4 would not meet the underlying purpose of the Project, which is to maintain Television City as a studio use and to modernize and enhance production facilities within the Project Site to meet both the existing unmet and anticipated future demands of the entertainment industry, keep production activities and jobs in Los Angeles, upgrade utility and technology infrastructure, and create a cohesive studio lot. Alternative 4 would be less effective than the Project in meeting this purpose as a result of the reduced amount of studio-related uses.

Regarding the Project objectives, Alternative 4 would meet the following Project objectives generally as effectively as the Project:

- Provide multi-modal transportation solutions, including a Project Mobility Hub, to connect TVC employees and guests with surrounding public transit lines, employee shuttles, and a rideshare program, to encourage alternative means of transportation, and focus growth in a high-density, jobs-rich area in close proximity to transit.

- Create a model for environmental sustainability in modern production studio operations by implementing best management practices regarding water, energy, and resource conservation.

Alternative 4 would partially meet the following Project objectives or would not meet the objectives as well as the Project, due to the reduced amount of studio-related development under this alternative:

- Provide adequate, safe, and efficient ingress/egress, circulation, staging, and parking that satisfies the unique demands of a large-scale production studio with

[30] While the underlying C2 zone has no height limit, height limits would be imposed by the Specific Plan.

direct, enhanced access to the uses on-site and sufficient truck and trailer circulation areas, in compliance with modern fire and life safety requirements.

- Create multiple production basecamps to allow for the flexible and efficient staging of vehicles needed for film and television productions.

- Promote local and regional economic growth by creating a wide range of entertainment jobs as well as construction jobs and keeping production jobs in Los Angeles.

- Contribute to Los Angeles' status as a global creative capital and provide maximum opportunity for productions to be filmed in the region through the continued use and expansion of the Project Site as a major studio and entertainment institution, in conformance with the goals and objectives of applicable local and regional plans and policies.

- Enhance the identity of the Project Site as an iconic entertainment and media center by providing architecturally distinct development and a creative signage program that reflects and complements the production uses on-site.

- Permit a reasonable, risk-adjusted return on investment commensurate with the Project Applicant's fiduciary responsibilities and allow for sustained economic viability and growth in an evolving entertainment market, while generating tax and property revenues to the City.

Alternative 4 would not meet all or portions of the following objectives, due to the nature of the alternative and the location of proposed development under this alternative's conceptual layout:

- Create a fully integrated and cohesive master planned site regulated by a Specific Plan that retains the Project Site's land use as a studio facility and provides an expandable, flexible, and operationally seamless production ecosystem that is able to respond to evolving market demands, support content creation, and maximize studio production capabilities.

- Rehabilitate and preserve the integrity of the Primary Studio Complex consistent with the HCM designation and restore the currently obstructed public views of the HCM consistent with the HCM designation, while building upon Pereira & Luckman's master plan for a flexible and expandable studio campus.

- Optimize the currently underutilized Project Site to address past ad hoc building additions and meet the existing unmet and anticipated future demands of the entertainment industry by providing new technologically advanced sound stages combined with an adequate and complementary mix of state-of-the-art production support facilities and production offices.

- Complement the neighboring community through design elements that would be compatible with surrounding uses, concentrate building mass and height towards the center of the Project Site, and provide an enhanced public realm to promote walkability, foster connectivity and safety, and better integrate on- and off-site uses.

V. Alternatives

E. Alternative 5: Above-Grade Parking Alternative

1. Description of the Alternative

Alternative 5, the Above-Ground Parking Alternative, is designed to reduce the Project's construction-related impacts by eliminating subterranean parking and therefore minimizing soil excavation and export. Accordingly, Alternative 5 would include the same proposed development program and layout as the Project, as shown in Figure V-6 on page V-128, except that all of the Project's subterranean parking would be moved above ground. Specifically, this alternative would include a varying three- to five-level parking podium along Fairfax Avenue and a three-level parking podium along Beverly Boulevard east of Genesee Avenue, each of which would form the base of the buildings in those locations, as well as a 12-level parking structure along The Grove Drive in the southeast corner of the Project Site, which collectively would provide approximately 5,300 parking spaces. These changes would result in increased building heights compared to the Project; thus, the maximum height limit of Height Zone B along the Grove Drive would be increased from 130 feet to 150 feet, and the maximum height limit of Height Zone C along Fairfax Avenue and Beverly Boulevard would be increased from 160 feet to 170 feet. Specifically, building heights along Fairfax Avenue would range from approximately 95 feet to 170 feet; buildings in the center of the Project Site would reach a maximum height of 225 feet, as under the Project; heights along the Shared Eastern Property Line would range from approximately 60 to 140 feet, and the southeastern parking structure would have an increased maximum height of 150 feet. As the only change relative to the Project would be to the parking configuration, Alternative 5 would involve the same sitewide FAR of 1.75:1 as the Project. Additionally, Alternative 5 would include the same restoration of and limited modifications to the Primary Studio Complex (HCM No. 1167), consistent with the HCM designation and the Project Parameters set forth in Section IV.B, Cultural Resources, of this Draft EIR.

This alternative would include the same entitlements as the Project; specifically, adoption of a Specific Plan and an associated General Plan Amendment and Zone Change, establishment of a Sign District, a Vesting Tentative Tract Map, and a Development Agreement. In addition, the unincorporated County parcel would be annexed to the City. Alternative 5 would also include the same Mobility Hub as the Project and the same frontage areas, building stepbacks, landscape plan, and streetscape improvements as the Project. Alternative 5 would be designed to meet LEED Gold or equivalent green

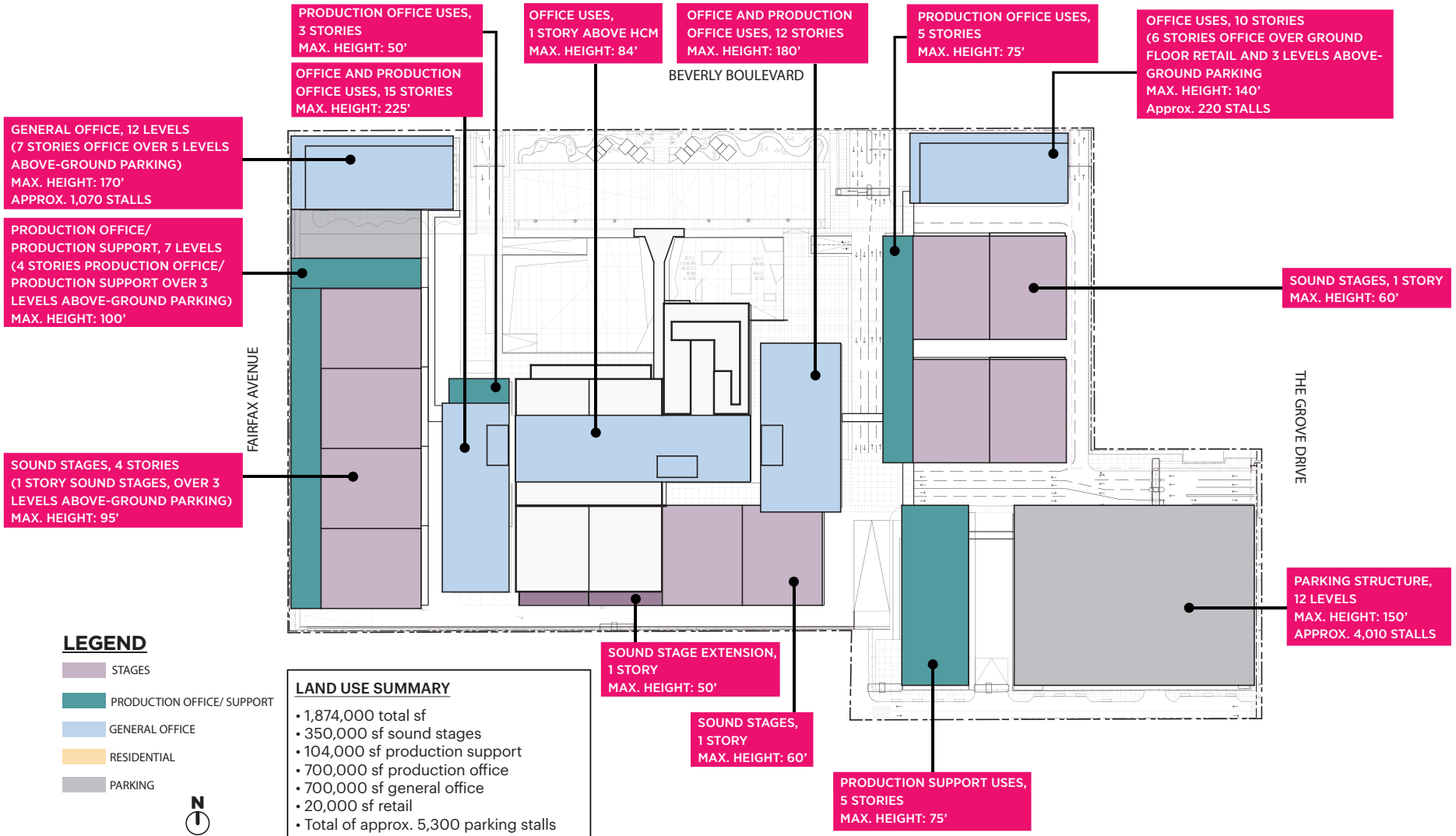

Figure V-6
Alternative 5 Conceptual Site Plan

Source: Rios, 2022.

building standards, and rooftop solar panels would be provided on-site, similar to the Project. However, the integration of basecamp, staging, and circulation areas for production vehicles with the new sound stages and production areas would be reduced under this alternative compared to the Project, as discussed further below.

As with the Project, Alternative 5 would involve 1,626,180 square feet of new construction, the demolition of 495,860 square feet of existing uses, and the retention of 247,820 square feet of existing uses. Since Alternative 5 involves the same floor area as the Project, it would involve the same overall construction activities, associated equipment, and duration of building construction, as well as the same peak level of daily building construction activity as the Project. Although no subterranean parking is proposed, Alternative 5 would require excavation for building footings, basements, and infrastructure. As such, excavation under Alternative 5 would extend to a maximum depth of approximately 15 feet and involve earthwork quantities of approximately 154,000 cy of cut, potentially approximately 23,000 cy of imported fill, and up to approximately 154,000 cy of export. This reduced level of earthwork would involve reduced peak day conditions and a shorter duration compared to the Project. Like the Project, this analysis assumes that buildout may occur in one phase, with completion in 2026, or that a long-term buildout option could be exercised with completion in 2043.[31]

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

As under the Project, construction of Alternative 5 has the potential to create air quality impacts through the use of heavy-duty construction equipment and vehicle trips generated by construction workers and haul trucks traveling to and from the Project Site. As discussed in Section IV.A, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Under Alternative 5, the overall amount of construction would be similar in comparison to the Project. However, the above-ground parking would require approximately 78 percent less import/export of soils. As a result, the intensity and duration

[31] Only those impacts that could vary with a long-term buildout are specifically addressed in the analysis below.

of air emissions and fugitive dust from grading and export activities would be substantially reduced in comparison to the Project, including on days when maximum construction activities occur. As maximum daily conditions are used for measuring impact significance, regional impacts on these days would be less than those of the Project and would be less than significant with the incorporation of mitigation (Mitigation Measures AIR-MM-1 through AIR-MM-4, set forth in Section IV.A, Air Quality, of this Draft EIR). Therefore, Alternative 5 would avoid the significant and unavoidable impacts associated with regional construction NO_X emissions under the Project.

Construction activities under Alternative 5 would be located at similar distances from sensitive receptors as under the Project. Since air emissions and fugitive dust from these construction activities would be less than those of the Project on maximum construction activity days, localized emissions under Alternative 5 would also be less than those of the Project and would occur for a shorter duration. Therefore, localized impacts under Alternative 5 would be less than significant with mitigation and less than the less-than-significant-with-mitigation impacts of the Project.

(b) Toxic Air Contaminants

As under the Project, construction of Alternative 5 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities would represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less than significant impacts with regard to TAC emissions. Overall, construction emissions generated by Alternative 5 would be less than those of the Project because Alternative 5 would include substantially less earthwork and associated import/export of soil. Thus, impacts related to TAC emissions and the corresponding individual cancer risk under Alternative 5 would be less than significant and less than the less-than-significant impacts of the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Similar to the Project, operational regional air pollutant emissions under Alternative 5 would be generated by vehicle trips to the Project Site and the consumption of electricity and natural gas. As discussed in the Alternatives Traffic Memo provided in Appendix P of this Draft EIR, development of Alternative 5 would result in the same number of daily vehicle trips and VMT as the Project (an estimated 13,454 daily vehicle trips and an estimated 95,865 total daily VMT). As vehicular emissions depend on the number of trips and VMT, vehicular sources associated with Alternative 5 would result in no change in air emissions compared to the Project. In addition, because the overall square footage would be unchanged when compared to the Project, the demand for electricity and natural gas

would be the same as the Project. Therefore, impacts associated with regional operational emissions under Alternative 5 would be less than significant and the same as the less-than-significant impacts of the Project.

With regard to on-site localized area source and stationary source emissions, as under the Project, Alternative 5 would not introduce any major new sources of air pollution within the Project Site. Therefore, similar to the Project, localized impacts from on-site stationary emission sources associated with Alternative 5 would also be less than significant. Such impacts would be the same as those of the Project due to the same land uses and overall square footage developed. Localized mobile source operational impacts are determined mainly by peak-hour intersection traffic volumes. As discussed above, Alternative 5 would result in the same number of daily vehicle trips as the Project, along with the same trip characteristics associated with the same land uses, which would correspond to the same number of peak-hour trips. Therefore, localized mobile source air quality impacts associated with Alternative 5 operations would be less than significant and the same as the Project's less-than-significant impacts.

(b) Toxic Air Contaminants

As discussed in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include diesel particulate matter from delivery trucks. As this alternative would involve the same proposed development program, the number of delivery trucks would also be the same as under the Project. Additionally, the types of uses proposed under both the Project and Alternative 5 are not considered land uses that generate substantial TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not proposed as part of the Project or Alternative 5. Similar to the Project, Alternative 5 would not release substantial amounts of TACs and would be consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Thus, potential TAC impacts under Alternative 5 would be less than significant and the same as the less-than-significant impacts of the Project.

(3) Concurrent Construction and Operation

In the event of a long-term buildout scenario, as with the Project, portions of the Project Site under Alternative 5 could be completed and occupied while completion of construction occurs. The intensity of this interim year air quality impact under Alternative 5 would be reduced in comparison to the Project since the intensity of construction activity would be reduced, primarily due to the 78 percent reduction in the import/export of soils. Concurrent construction and operational regional air quality impacts associated with NO_X and VOC emissions under Alternative 5 would remain significant and unavoidable but would be less than the significant and unavoidable impacts of the Project.

b. Cultural Resources

(1) Historical Resources

As previously discussed and detailed in Section IV.B, Cultural Resources, of this Draft EIR, the Primary Studio Complex within the Project Site is designated as HCM No. 1167, and several historical resources exist in the immediate vicinity, including The Original Farmers Market and Rancho La Brea Adobe (6333 West 3rd Street), Chase Bank (312 North Fairfax Avenue), Fairfax Theater (7901–7909 West Beverly Boulevard), and Air Raid Siren No. 25 (near 309 Ogden Drive).

Alternative 5 would involve the same proposed development program and layout as the Project except for the above-ground parking podiums, which would increase building heights and density under this alternative. Like the Project, buildout under Alternative 5 would alter the immediate surroundings of the Primary Studio Complex by adding new development on-site and replacing existing buildings and expanses of surface parking. However, the immediate surroundings of the Primary Studio Complex have already been substantially altered since its period of significance (1952-1963), including building expansions, replacement of the front lawn with surface parking, and the introduction of ancillary buildings and structures throughout the Project Site. These changes over time have altered the immediate on-site surroundings such that the immediate setting no longer contributes to the historic significance or integrity of the Primary Studio Complex. As under the Project, Alternative 5 would involve new construction in areas that have already been altered since the period of significance. Additionally, the same restoration of and limited modifications to the HCM would occur under Alternative 5, and Alternative 5 would include the same Project design features set forth in Section IV.B, Cultural Resources, of this Draft EIR, including the Project Parameters (Project Design Feature CUL-PDF-1), Historic Structure Report (HSR; Project Design Feature CUL-PDF-2), and compliance with the Cultural Heritage Ordinance. Therefore, similar to the Project, the Project Site buildout under Alternative 5 would not materially impair the historic significance or integrity of the Primary Studio Complex.

More specifically, adherence to the Project Parameters would ensure that Alternative 5 preserves the historic significance and integrity of the Primary Studio Complex. Among other things, the Project Parameters would allow for the removal of non-historic additions and the retention of character-defining features to ensure that the Primary Studio Complex is not adversely impacted. In addition, Alternative 5 would include the preparation of an HSR to guide the rehabilitation of the Primary Studio Complex in accordance with the Rehabilitation Standards. As under the Project, OHR would use the HSR in reviewing plans and approving permits for Alternative 5 pursuant to the requirements of the Cultural Heritage Ordinance.

As such, like the Project, Alternative 5 would not materially impair the significance of any historical resources located on the Project Site or in the Project Site Vicinity through physical demolition, destruction, relocation, rehabilitation, or new construction.[32] Thus, Alternative 5 would not result in a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. As such, impacts to historical resources would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(2) Archaeological Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, SCCIC records indicate that one historic-period archaeological resource is located south of the Project Site and consists of a brick-lined structure and historic trash scatter dating between the 1910s and 1940s. No archaeological resources have been previously recorded within the Project Site. Although no subterranean parking is proposed, Alternative 5 would require excavation for building footings, basements, and infrastructure. Specifically, excavation under Alternative 5 would extend to a maximum depth of approximately 15 feet, as compared to approximately 45 feet of excavation under the Project, and involve approximately 154,000 cy of cut compared to approximately 772,000 cy under the Project. Therefore, like the Project, Alternative 5 has the potential to uncover previously unidentified archaeological resources, but to a lesser extent than the Project. Alternative 5 would also comply with the same regulatory requirements and implement the same mitigation measure (Mitigation Measure CUL-MM-1, set forth in Section IV.B, Cultural Resources, of this Draft EIR) as the Project in the event that archaeological resources are uncovered during ground disturbance activities. As such, the potential to uncover previously unidentified archaeological resources would be less than significant with mitigation, and such impacts would be less than the less-than-significant-with-mitigation impacts of the Project.

c. Energy

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

Similar to the Project, as discussed in Section IV.C, Energy, of this Draft EIR, construction activities associated with Alternative 5 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting,

[32] The Historic Report defined the Project Site Vicinity as all parcels immediately adjacent to the Project Site, as well as all parcels located directly across the street from the Project Site. Streets bordering the Project Site include Beverly Boulevard to the north, Fairfax Avenue to the west, The Grove Drive to the east, and the southern property line to the south. The Project Site Vicinity consists of the areas where potential direct or indirect impacts to historical resources could reasonably be expected to occur.

electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be reduced compared to the Project due to the reduction in the overall amount of soil import/export. Furthermore, as with the Project, construction activities under Alternative 5 would comply with all applicable regulatory requirements relating to energy use. Therefore, like the Project, short-term energy use during the construction of Alternative 5 would not occur in a wasteful, inefficient or unnecessary manner, and impacts would be less than significant and similar to the less-than-significant impacts of the Project.

Also like the Project, operation of Alternative 5 would generate an increase in the consumption of electricity, natural gas, and petroleum-based fuels compared to existing conditions. Even though Alternative 5 would result in the same overall building square footage, this alternative would result in slightly less operational energy demand associated with mechanical ventilation, which would not be required for the above ground parking structures. All other operations would generate the same estimated energy demands as the Project. In terms of petroleum-based fuel usage, the number of daily trips generated by this alternative would be the same as the Project. Furthermore, LADWP and SoCalGas have confirmed that the electrical and natural gas infrastructure in the Project area has adequate capacity to serve the Project; thus, adequate capacity would also be available to serve Alternative 5. Lastly, the consumption of electricity, natural gas, and petroleum-based fuels under this alternative would not be wasteful, inefficient, or unnecessary since the development would represent an infill project within an urbanized area that is well served by public transportation which would contribute to an energy-efficient land use pattern consistent with SCAG's 2020–2045 RTP/SCS growth forecast. Operation of the proposed uses would comply with applicable energy efficiency standards, and new buildings would be developed in accordance with the latest energy efficiency standards. Therefore, like the Project, long-term energy use during operation of Alternative 5 would not occur in a wasteful, inefficient, or unnecessary manner. Impacts would be less than significant and roughly similar to the less-than-significant impacts of the Project.

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

Alternative 5 would result in slightly less operational energy demand than the Project since mechanical ventilation would not be required for the above-ground parking structures. All other operations would generate the same energy demands as the Project. Like the Project, the consumption of electricity, natural gas, and petroleum-based fuels under this alternative would not be wasteful, inefficient, or unnecessary since the proposed uses would comply with applicable energy efficiency standards and the development would represent an infill project within an urbanized area that is well served by public transportation thus contributing to an energy efficient land use pattern consistent with SCAG's 2020–2045 RTP/SCS growth forecast. Therefore, like the Project, Alternative 5 would not conflict with plans or policies regarding renewable energy and energy efficiency,

and the alternative would result in less than significant impacts, similar to the less-than-significant impacts of the Project.

d. Geology and Soils

(1) Geologic Hazards

The Project Site is located within the seismically active region of Southern California. Thus, under Alternative 5, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, liquefaction, seismically induced settlement, and subsidence, would be similar to those under the Project, particularly since such impacts are a function of a site's underlying geologic conditions rather than the type of land uses or amount of development proposed. As with the Project, Alternative 5 would be subject to all applicable regulations, including the applicable provisions in the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the California Building Code, the City's General Plan Safety Element, and the Los Angeles Building Code. Lastly, similar to the Project, Alternative 5 would not include uses such as mining operations, deep excavation into the earth, or boring of large areas creating unstable seismic conditions or stresses in the earth's crust. Therefore, as with the Project, Alternative 5 would not cause or accelerate geologic conditions which could result in substantial damage to proposed structures or infrastructure or expose people to substantial risk of injury. Impacts related to geology and soils under Alternative 5 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(2) Paleontological Resources

As discussed in Section IV.D, Geology and Soils, of this Draft EIR, according to a records search of the paleontological specimen and locality records held by the LACM Vertebrate Paleontology Department and the Paleontology Technical Report prepared by Dudek, there are no previously encountered fossil vertebrate localities located within the Project Site. However, localities have been documented elsewhere in the area from the same geologic units that occur beneath portions of the Project Site, and several of these localities are located within approximately 2,000 feet of the Project Site at depths as shallow as 10 feet bgs. Although no subterranean parking is proposed, Alternative 5 would require excavation for building footings, basements, and infrastructure. Specifically, excavation under Alternative 5 would extend to a maximum depth of approximately 15 feet, as compared to approximately 45 feet of excavation under the Project, and involve approximately 154,000 cy of cut compared to approximately 772,000 cy under the Project. Therefore, like the Project, Alternative 5 has the potential to uncover previously unidentified paleontological resources, but to a lesser extent than the Project. Alternative 5 would also comply with the same regulatory requirements and implement the same mitigation measure (Mitigation Measure GEO-MM-1, set forth in Section IV.D, Geology and Soils, of this Draft

EIR) as the Project in the event that paleontological resources are uncovered during ground disturbance activities. As such, the potential to uncover previously unidentified paleontological resources would be less than significant with mitigation, and such impacts would be less than the less-than-significant-with-mitigation impacts of the Project due to the reduction in earthwork.

e. Greenhouse Gas Emissions

(1) Construction

Under Alternative 5, the overall amount and duration of building construction would be the same as the Project. However, construction of Alternative 5 would require approximately 78 percent less import/export of soil. Thus, construction of Alternative 5 would result in reduced GHG emissions are compared to the Project. Therefore, GHG emissions during the construction of Alternative 5 would be less than significant and less than the less-than-significant impacts of the Project.

(2) Operation

As discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, GHG emissions from a development project are determined in large part by the number of daily trips generated and the energy consumption associated with the proposed land uses. As discussed in the Transportation analysis below, development of Alternative 5 would result in the same number of daily vehicle trips and VMT as the Project.[33] As vehicular emissions depend on the number of trips and VMT, vehicular sources would result in no change in air emissions compared to the Project. Even though Alternative 5 would result in the same amount of overall building square footage, this alternative would result in slightly less operational GHG emissions associated with energy usage since mechanical ventilation would not be required for belowground parking structures. All other operations would produce the same estimated amount of GHG emissions as the Project. Thus, the amount of GHG emissions generated by Alternative 5 would be roughly similar to the Project. As with the Project, Alternative 5 would be designed to comply with the City's Green Building Ordinance, as applicable, and would incorporate sustainability features similar to those set forth in Project Design Features GHG-PDF-1 and GHG-PDF-2 to reduce GHG emissions. Specifically, Alternative 5 would be designed to meet LEED Gold or equivalent green building standards, and rooftop solar panels capable of generating 2,000,000 kilowatt-hours annually would be installed, similar to the Project. Furthermore, as with the Project, Alternative 5 would represent infill development within an urban area that is well served by

[33] Gibson Transportation Consulting, Inc., Transportation Analysis of Project Alternatives for the Television City 2050 Project, April 2022.

public transportation and thus would contribute to an energy-efficient land use pattern which would support the goals of the RTP/SCS intended to reduce GHG emissions. Therefore, it is anticipated that Alternative 5, like the Project, would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 5 would be less than significant and similar to the less-than-significant impacts of the Project.

f. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, hazardous materials, such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, would be used and, therefore, would require proper handling and management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases and, subsequently, the exposure of the public to hazardous materials. However, as discussed for the Project in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, all potentially hazardous materials under Alternative 5 would be used, stored, and disposed in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use.

With respect to existing conditions, as discussed in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, the Project Site is identified in multiple databases compiled pursuant to Government Code Section 65962.5. These listings collectively constitute a REC and CREC. In addition, like the Project, Alternative 5 would have the potential to encounter contaminated soils, soil gas, and impacted groundwater during construction. Although no subterranean parking is proposed, Alternative 5 would require excavation for building footings, basements, and infrastructure. Specifically, excavation under Alternative 5 would extend to a maximum depth of approximately 15 feet and involve approximately 154,000 cy of cut, potentially approximately 23,000 cy of imported fill, and up to approximately 154,000 cy of export, representing a 78 percent reduction in import/export compared to the Project. Furthermore, Alternative 5 is estimated to require the removal of approximately 6,000 cy of contaminated soil as compared to approximately 60,000 cy under the Project. As with the Project, any contaminated soils, soil gas, or impacted soil and groundwater encountered would be treated and disposed of in accordance with applicable regulations, and mitigation would include a soil management plan and subsurface gas controls to reduce potential impacts to less-than-significant levels. Lastly, Alternative 5 would involve the same demolition as the Project, thus involving the same potential to encounter or release ACM or LBP as the Project. Regulatory compliance would minimize associated hazards, and Alternative 5 would implement Project design features similar to those of the Project, including preparation of a Hazardous Building

Materials Demolition Assessment and Management Plan for SCAQMD and LAFD review and approval and sampling for LBP prior to demolition.

Overall, the impacts related to hazards and hazardous materials during construction under Alternative 5 would be less than significant with mitigation, and such impacts would be less than the less-than-significant-with-mitigation impacts of the Project.

(2) Operation

Operation of Alternative 5 would involve the use of limited quantities of potentially hazardous materials typical of those used in studio campuses, including paints, stains, adhesives, solvents and other materials used in set design and fabrication, fuels, pesticides for landscaping, cleaning and maintenance supplies, materials for pyrotechnic special effects, and other general products related to studio operations. Like the Project, as discussed in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, all hazardous materials on the Project Site under Alternative 5 would be acquired, handled, used, stored, and disposed of in accordance with all applicable federal, state and local requirements. Project Design Features HAZ-PDF-1 through HAZ-PDF-6, set forth in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, calling for safety and emergency plans and training would be implemented, similar to the Project, and all necessary permits for filming activities and related operations would be obtained, as required. Such safety and emergency plans and training would include the Consolidated Contingency Plan, the Television Studios Emergency Action Plan, the Television Studios Safety Manual, and the Television Studios Injury and Illness Prevention Program. Additionally, like the Project, Alternative 5's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding Project Site access, thus providing adequate emergency access. Overall, impacts would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

g. Hydrology and Water Quality

(1) Surface Water Hydrology

(a) Construction

Similar to the Project, construction activities for Alternative 5 would include the removal of surface parking areas and new building construction with the same conceptual site plan as the Project, except that all parking would be located in above-ground structures. As with the Project, these construction activities would have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Also similar to the Project, Alternative 5 would be required to obtain coverage

under the NPDES Construction General Permit. In accordance with the requirements of this permit, Alternative 5 would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. In addition, Alternative 5 would be required to comply with all applicable City grading permit regulations which establish the measures, plans, and inspections necessary to reduce sedimentation and erosion, similar to the Project. Thus, through compliance with all NPDES Construction General Permit requirements, including preparation of a SWPPP, implementation of BMPs, and compliance with applicable City grading regulations, Alternative 5 would not alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, or flooding on- or off-site. Similarly, with adherence to standard compliance measures, construction activities would not cause flooding, substantially increase or decrease the amount of surface water flow from the Project Site into a water body or result in a permanent, adverse change to the movement of surface water. Therefore, construction-related impacts to surface water hydrology under Alternative 5 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, Alternative 5 would include the development of new buildings, paved areas, and landscaped areas, with the same site plan as the Project, except that all parking would be located in above-ground structures. As with the Project, Alternative 5 would include up to approximately 90 percent impervious surfaces upon buildout, similar to existing conditions. Accordingly, there would be no increase in runoff volumes into the existing storm drain system. Furthermore, as with the Project, Alternative 5's stormwater infrastructure would be designed to convey a 50-year storm to the designated discharge location. Inlets within the Project Site would be sized to eliminate the potential for ponding. As such, drainage within the Project Site during operation of Alternative 5 would be similar to existing conditions.

Based on the above, Alternative 5 would not impact the existing storm drain infrastructure serving the Project Site, and runoff would continue to follow the same discharge paths and drain to the same storm systems. Consequently, Alternative 5 would not cause flooding during a 50-year storm event, would not create runoff that would exceed the capacity of existing or planned drainage systems, would not require construction of new stormwater drainage facilities or expansion of existing facilities, would not substantially reduce or increase the amount of surface water in a water body, or result in a permanent adverse change to the movement of surface water. Therefore, operational impacts to surface water hydrology under Alternative 5 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(2) Surface Water Quality

(a) Construction

Similar to the Project, new pollutants could be introduced to the Project Site during construction. As with the Project, a SWPPP would be prepared for Alternative 5 and would specify BMPs to be used during construction. In addition, although no subterranean parking is proposed, Alternative 5 would require excavation for building footings, basements, and infrastructure. Specifically, excavation under Alternative 5 would extend to a maximum depth of approximately 15 feet, as compared to approximately 45 feet of excavation under the Project, and involve approximately 154,000 cy of cut, potentially approximately 23,000 cy of imported fill, and up to approximately 154,000 cy of export, representing a 78 percent reduction in import/export as compared to the Project. Furthermore, as discussed in Section IV.D, Geology and Soils, of this Draft EIR, the Geotechnical Investigation concluded that the historically highest groundwater level of eight feet bgs should be conservatively utilized. Therefore, although excavation activities under Alternative 5 would be reduced compared to the Project, Alternative 5 could potentially require a temporary dewatering system during construction, similar to the Project.

With the implementation of site-specific BMPs included as part of the SWPPP, Alternative 5 would reduce or eliminate the discharge of potential pollutants from stormwater runoff. In addition, construction of Alternative 5 would be required to comply with City grading permit regulations, which require necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspection to reduce sedimentation and erosion. With compliance with NPDES requirements and City grading permit regulations, construction of Alternative 5 would not result in discharges that violate any water quality standard or waste discharge requirements or otherwise substantially degrade water quality. Furthermore, construction of Alternative 5 would not result in discharges that would cause regulatory standards to be violated in the Ballona Creek Watershed. Therefore, as with the Project, construction-related impacts to surface water quality under Alternative 5 would be less than significant, and such impacts would be less when compared to the less-than-significant impacts of the Project due to the reduction in earthwork.

(b) Operation

Like the Project, pollutants to the stormwater system potentially generated by Alternative 5 would include sediment, nutrients, pesticides, metals, pathogens, and oil and grease, similar to existing conditions. Also similar to the Project, Alternative 5 would implement BMPs for managing stormwater runoff in accordance with the City's LID Ordinance requirements. The BMPs would control stormwater runoff such that no increase in runoff over existing conditions would result from the alternative. As with the Project, Alternative 5 would include a capture and use system (or other biofiltration/bioretention

system) for irrigation purposes, consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff from the Project Site. With the incorporation of the LID BMPs, operation of Alternative 5 would not result in discharges that would violate any water quality standard or waste discharge requirements, or otherwise substantially degrade water quality. Thus, as with the Project, impacts to surface water quality during operation of Alternative 5 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(3) Groundwater Hydrology

(a) Construction

As previously discussed, as with the Project, Alternative 5 could require a temporary dewatering system during construction which would be installed and operated in accordance with NPDES General Construction Permit requirements. Any discharge of groundwater during construction of Alternative 5 would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements. As discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, no water supply wells are located at the Project Site or within 1 mile of the Project Site that could be impacted by construction. In addition, as with the Project, Alternative 5 would not include the construction of water supply wells. Therefore, impacts on groundwater hydrology during construction of Alternative 5 would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project given the reduction in excavation.

(b) Operation

Subterranean parking is not proposed under Alternative 5. As such, as with the Project, permanent dewatering operations are not expected during operation of Alternative 5. As discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, the Project Site is currently approximately 90 percent impervious, and, as such, minimal groundwater recharge occurs. Similar to the Project, Alternative 5 would continue to be comprised of up to approximately 90 percent impervious surfaces following buildout. Therefore, impacts to groundwater hydrology during operation of Alternative 5 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(4) Groundwater Quality

(a) Construction

Similar to the Project, Alternative 5 could require dewatering during construction, which would occur pursuant to, and comply with, the applicable NPDES permit or industrial

user sewer discharge permit requirements. Pursuant to such requirements, any extracted groundwater would be chemically analyzed to determine the appropriate treatment and/or disposal methods.

During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would, therefore, require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials to be released into groundwater. In addition, like the Project, Alternative 5 would have the potential to encounter contaminated soils, soil gas, and impacted soil and groundwater during construction. However, as previously discussed, such potential would be reduced as compared to that of the Project due to the reduced excavation activities under this alternative. Specifically, Alternative 5 is anticipated to require the removal of up to approximately 6,000 cy of contaminated soil as compared to approximately 60,000 cy under the Project. Furthermore, Alternative 5 would implement similar mitigation measures as the Project, including a soil management plan and subsurface gas controls, to ensure that potential impacts related to the exposure or release of subsurface gases and impacted soil and groundwater are less than significant.

Moreover, compliance with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous waste would reduce the potential for the construction of Alternative 5 to release contaminants into groundwater that could affect the rate or direction of movement of existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well downstream. Furthermore, as there are no groundwater production wells or public water supply wells on-site or within 1 mile of the Project Site, construction activities would not affect existing wells.

Based on the above, impacts with respect to groundwater quality during construction under Alternative 5 would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project, due to the reduction in excavation.

(b) Operation

Operational activities that could affect groundwater quality include spills of hazardous materials. In accordance with City requirements, source control measures, including good housekeeping, removal of trash and maintenance of driveways and parking areas, and proper use and storage of pesticides, would reduce water quality impacts and prevent pollutants from entering the groundwater by percolation within landscaped areas or other permeable surfaces. Alternative 5 is not anticipated to result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise reach groundwater through percolation. Furthermore, there are currently no

USTs within the Project Site, and no new USTs would be installed as part of the alternative. Lastly, Alternative 5 would include the same development footprint as the Project. Therefore, as with the Project, impacts with respect to groundwater quality during operation of Alternative 5 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

h. Land Use and Planning

As previously described, Alternative 5 would include the same proposed development program and layout as the Project except that all parking would be located in above-ground structures. This alternative would include the same entitlements as the Project; specifically, adoption of a Specific Plan and an associated General Plan Amendment and Zone Change, establishment of a Sign District, a Vesting Tentative Tract Map, and a Development Agreement. In addition, the unincorporated County parcel would be annexed to the City. As with the Project, based on approval of the requested land use entitlements, Alternative 5 would be consistent with the applicable goals, policies, and objectives in local and regional plans that were adopted to avoid or mitigate an environmental effect, including, but not limited to, the City's General Plan Framework Element, Wilshire Community Plan, LAMC, and SCAG's 2020–2045 RTP/SCS. Therefore, the impacts of Alternative 5 related to potential conflicts with applicable land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project. However, due to the addition of substantial above-ground parking podiums, Alternative 5 would result in increased building heights and overall density compared to the Project, which could be considered less compatible with the predominantly low- and mid-rise land uses in the surrounding area.

i. Noise

(1) Noise

(a) Construction

The types of construction activities and associated equipment under Alternative 5 would be substantially similar to the Project, with the exception of the reduced amount of grading and associated reduction in overall duration of construction activities. As with the Project, construction of Alternative 5 would generate noise from the use of heavy-duty construction equipment, as well as from haul truck and construction worker trips. Under Alternative 5, on-site building construction activities and the associated construction noise levels would be substantially similar to those of the Project on maximum activity days since the daily intensity of building construction activities would be similar to the Project. As such, on-site construction noise levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project.

As it relates to off-site noise, Alternative 5 would eliminate the Project's subterranean parking structures, which would substantially reduce the amount of excavation and off-site hauling. The number of haul trucks under Alternative 5 would be reduced from approximately 300 haul trucks (600 haul truck trips) per day under the Project to 140 haul trucks (280 haul truck trips) per day under Alternative 5, which would reduce the daytime off-site noise impact along Fairfax Avenue to a less-than-significant level. However, similar to the Project, a concrete mat foundation pour would occur over the course of up to five days, involving up to 500 concrete trucks (1,000 concrete truck trips) per day, based on a 20-hour workday. Thus, the mat foundation stage would occur during nighttime hours, if permitted by the Executive Director of the Board of Police Commissioners. As with the Project, the estimated noise levels associated with concrete trucks along Fairfax Avenue would exceed the measured nighttime ambient noise levels plus the 5-dBA significance threshold.

Alternative 5 would implement the same Project design features and the same mitigation measure (specifically, Project Design Features NOI-PDF-1 through NOI-PDF-5 and Mitigation Measure NOI-MM-1, set forth in Section IV.I, Noise, of this Draft EIR) as the Project, which would minimize construction noise. Nonetheless, similar to the Project, on- and off-site construction noise impacts (both project-level and cumulative) would be significant and unavoidable under Alternative 5. The on-site construction noise impacts would be the same as the Project's significant and unavoidable impacts since noise levels on maximum activity days would be similar to the Project and would occur for a reduced duration due to the reduction in grading. While the Project's significant and unavoidable off-site noise impact associated with soil export would be avoided, Alternative 5 would result in the same significant and unavoidable off-site noise impact associated with potential nighttime concrete truck trips along Fairfax Avenue. As this impact would only occur for five days, overall off-site noise impacts would be reduced in comparison to the Project.

In summary, impacts with regard to on-site construction noise impacts (both Project-level and cumulative) would be significant and unavoidable under Alternative 5 and similar to the significant-and-unavoidable impacts of the Project. Impacts with regard to off-site construction noise impacts (both Project-level and cumulative) would be significant and unavoidable under Alternative 5 and less than the significant-and-unavoidable impacts of the Project.

(b) Operation

As discussed in Section IV.I, Noise, of this Draft EIR, sources of operational noise for the Project would include on-site stationary noise sources, including mechanical equipment, activities within outdoor spaces (i.e., outdoor roof decks and outdoor studio production activities), parking facilities, loading docks and trash compactors; and off-site

mobile (roadway traffic) noise sources. Alternative 5 would introduce similar noise sources as the Project based on the same proposed development program, layout, and operational characteristics. Therefore, noise levels from building mechanical equipment, use of outdoor spaces, parking facilities, loading docks, and trash compactors would be similar to those of the Project. Alternative 5 would implement the same Project design features, including Project Design Feature NOI-PDF-3 (acoustic screening of mechanical equipment), Project Design Feature NOI-PDF-4 (controls on amplified sound), and Project Design Feature NOI-PDF-5 (limits on outdoor studio production within 200 feet of the Shared Eastern Property Line), which would minimize on-site operational noise. Accordingly, operational on-site noise impacts under Alternative 5 would be less than significant and the same as the less-than-significant impacts of the Project.

With regard to operational off-site (traffic) noise, Alternative 5 would generate the same operational trip generation as the Project based on the same development program. Therefore, off-site noise impacts under Alternative 5 would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

As noted above, the types of construction activities and associated equipment under Alternative 5 would be the same as the Project's, with the same general intensity of construction, although less excavation would occur. Therefore, the on- and off-site vibration levels during construction would be similar to those of the Project since construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment. Additionally, although fewer haul truck trips would occur under Alternative 5, trucks passing in close proximity to sensitive uses along the haul route would exceed the vibration significance criteria for human annoyance, similar to the Project. As such, peak vibration levels generated by construction equipment and construction truck trips under Alternative 5 would be similar to those of the Project, although such impacts would occur for a shorter duration due to the reduction in on-site grading and haul trips. Accordingly, construction activities under Alternative 5 would result in the same significant and unavoidable on- and off-site vibration impacts (pursuant to the significance threshold for human annoyance) and the same less-than-significant on- and off-site vibration impacts (pursuant to the significance threshold for building damage) as the Project.

(b) Operation

As described in Section IV.I, Noise, of this Draft EIR, sources of vibration related to Project operations would include vehicle circulation, delivery trucks, and building mechanical equipment. These same sources of operational vibration would occur under

Alternative 5. As with the Project, vehicular-induced vibration from Alternative 5 would not generate perceptible vibration levels at off-site sensitive uses. In addition, like the Project, building mechanical equipment installed as part of Alternative 5 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include vibration-attenuation mounts to reduce vibration transmission such that the vibration would not be perceptible at any off-site sensitive receptors. Therefore, as with the Project, operation of Alternative 5 would not increase vibration levels in the immediate vicinity of the Project Site. As such, vibration impacts associated with operation of Alternative 5 would also be less than significant and similar to the less-than-significant impacts of the Project.

j. Public Services

(1) Fire Protection

(a) Construction

The types of construction activities required for Alternative 5 would be similar to those of the Project, although the amount of earthwork and associated soil export and truck trips would be reduced. Like the Project, construction under Alternative 5 would occur in compliance with all applicable federal, state, and local requirements concerning fire prevention and hazardous materials, which would effectively reduce the potential for significant construction-related fire and explosion impacts. Additionally, similar to the Project, Alternative 5 would maintain travel lanes on all streets around the Project Site throughout the construction period and implement a Construction Traffic Management Plan, which would include provisions for maintaining emergency access during construction. Furthermore, emergency vehicles have the ability to avoid traffic delays through the use of sirens to clear paths of travel in accordance with the CVC. Therefore, construction of Alternative 5, like the Project, would not result in the need for new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 5 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(b) Operation

Alternative 5 would involve the same land uses, floor area, and associated employment generation as the Project and, thus, the number of new employees present on-site would be the same as the Project. As such, this alternative would generate a similar demand for LAFD fire protection services on a daily basis. Similar to the Project, Alternative 5 would comply with applicable City Building Code and Fire Code requirements regarding structural design, building materials, Project Site access, fire flow, storage and management of hazardous materials including pyrotechnical supplies, alarm and

communications systems, and life safety features (e.g., automatic fire sprinkler systems, fire service access elevators, etc.) and would undergo LAFD fire/life safety plan review, which would reduce the demand for fire protection and emergency medical services and also ensure adequate emergency access. Furthermore, as with the Project, traffic generated by Alternative 5 would not significantly impact emergency vehicle response to the Project Site and surrounding area as the drivers of emergency vehicles have the ability to bypass traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Based on the same proposed development program, Alternative 5 would have the same fire flow requirement as the Project, and, thus, LADWP would be able to supply sufficient flow and pressure to satisfy the fire suppression needs of Alternative 5, as with the Project. Furthermore, the existing helipad on-site would be retained in approximately the same location on the Project Site, but at a higher elevation, similar to the Project.

Therefore, similar to the Project, this alternative would not necessitate the construction of new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. As such, impacts with regard to fire protection services during operation of Alternative 5 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(2) Police Protection

(a) Construction

As discussed above, the types of construction activities under Alternative 5 would be similar to those of the Project; however, the amount of earthwork and associated soil export and truck trips would be reduced compared to the Project due to the elimination of subterranean parking. Similar to the Project, construction activities would not generate a permanent population on the Project Site that would substantially increase the police service population of the Wilshire Community Police Station. In addition, fencing or walls would be used to provide a secure Project Site perimeter, and access would continue to be controlled via staffed guard houses, similar to both existing conditions and the Project. Therefore, as with the Project, construction of Alternative 5 would not contribute to a temporary increased demand for police protection services. With continued implementation of these security measures, the potential demand on police protection services at the Project Site associated with theft and vandalism during construction would be reduced.

Like the Project, Alternative 5 would implement a Construction Traffic Management Plan to ensure the continued provision of emergency access during construction. Additionally, pursuant to CVC Section 21806, emergency vehicles can use their sirens to

clear a path of travel or drive in the lanes of opposing traffic during an emergency to avoid traffic. Therefore, as with the Project, construction of Alternative 5 would not result in the need for new or altered government facilities (i.e., police stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 5 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project due to the reduction in overall construction activities (i.e., earthwork).

(b) Operation

Like the Project, Alternative 5 would not include any residential uses and, thus, would not increase the service population of the Wilshire Community Police Station or impact the officer-to-population ratio within the Wilshire Division. Alternative 5 would implement the same security features as the Project, including a private on-site security staff and regular security patrols, which would reduce the demand for police services. Alternative 5 would also generate General Fund tax revenues for the City that could be used to expand law enforcement resources in the Wilshire Division, similar to the Project. Therefore, Alternative 5 would not result in the need for new or altered government facilities (i.e., police stations), the construction of which would cause significant environmental impacts, in order to maintain service, similar to the Project. Impacts under Alternative 5 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

k. Transportation

Transportation impacts associated with Alternative 5 are addressed in the Alternatives Traffic Memo provided in Appendix P of this Draft EIR. As discussed therein, the transportation-related plans, policies, and programs applicable to the Project would also apply to Alternative 5. As with the Project, this alternative would not interfere with the complete streets balanced transportation network (i.e., Transit-Enhanced Network, Bicycle Enhanced Network, and Pedestrian-Enhanced Districts) concept of the Mobility Plan and would enhance pedestrian access within and around the Project Site as called for by the Mobility Plan and the Wilshire Community Plan. The alternative would also prioritize safety and access for all individuals utilizing the Project Site by complying with all ADA requirements as required by the LAMC; include sidewalk and driveway design, vehicular parking, bicycle parking, etc., in accordance with LAMC requirements; and represent urban infill development within a TPA and HQTA in close proximity to transit which would encourage alternative transportation use as called for by the Mobility Plan and 2020–2045 RTP/SCS. Alternative 5 would support these transportation plans for the same reasons as the Project and would include a Mobility Hub, similar roadway and sidewalk improvements, sufficient parking, etc. Alternative 5 would also implement a TDM Program to reduce VMT,

as called for by the Mobility Plan, Wilshire Community Plan, 2020–2045 RTP/SCS, and the City's TDM Ordinance.

Furthermore, as discussed in Section IV.K, Transportation, of this Draft EIR, Fairfax Avenue and Beverly Boulevard adjacent to the Project Site and West 3rd Street to the south are identified as part of the Vision Zero's High Injury Network. As with the Project, it is assumed Alternative 5 would include the Project's off-site Vision Zero safety improvements, including bus stop improvements along the Project Site perimeter along Fairfax Avenue and Beverly Boulevard, which would include adequate benches, shelters, lighting, LED displays, and signage to the extent feasible under the City of Los Angeles' current bus shelter contract; and a financial contribution toward the funding of pedestrian facilities and safety improvements within the area. The alternative's improvements to the pedestrian environment would not preclude future Vision Zero safety improvements by the City. Additionally, as with the Project, the Project Applicant would contribute to signal improvements at nearby intersections as required by LADOT.

Therefore, as with the Project, Alternative 5 would not conflict with a program, plan, ordinance, or policy addressing the circulation system. Impacts would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

With respect to VMT, Alternative 5 would result in the same total daily work VMT and daily work VMT per employee as the Project, as this alternative would include the same proposed development program except with all parking located in above-ground structures. Specifically, as with the Project, Alternative 5 would generate an estimated 52,194 daily work VMT and would result in an average work VMT per employee of 6.7, which would be below the work VMT per employee significance threshold of 7.6 for the Central APC. Therefore, like the Project, Alternative 5 would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b), regarding VMT, and impacts would be less than significant. Overall, Alternative 5 would have the same VMT impact as the Project, generating an estimated 95,865 total VMT. As such, impacts would be the same as under Alternative 5 when compared to the Project.

Regarding freeway safety, as discussed in the Alternatives Traffic Memo, Alternative 5 would not add 50 feet or more to queues on the US-101 southbound off-ramp at Highland Avenue during either peak hour and, thus, would not exceed the ramp storage length. Alternative 5 would generate the same number of peak-hour trips to the US-101 southbound off-ramp at Highland Avenue as the Project, which would generate an estimated 42 morning peak-hour trips and 16 afternoon peak-hour trips on the off-ramp. Therefore, like the Project, Alternative 5 would neither be subject to speed differential analyses nor cause a significant freeway safety impact. Impacts related to freeway safety

would be less than significant, and such impacts would be the same as the less-than-significant impacts of the Project.

However, the elimination of subterranean parking under Alternative 5 would require changes to the Project's internal circulation plan. Under the Project, 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 basecamp areas 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. However, with all parking under Alternative 5 located in above-ground parking structures, the design of these production-related circulation areas would be compromised and need to be modified. In some locations, production staging and basecamp uses would need to be located on higher floors, which would disrupt production circulation and staging. The advantage of a unified, contiguous production activity level is to minimize hauling, loading, and distribution of production materials on-site. If a stage is located several stories up on an above-grade structure, extensive and expensive ramping would need to be built to service and load these stages. As a result, production would be hampered, and operations would be compromised. As such, studio operations would be much less efficient and flexible in comparison to the Project.

I. Tribal Cultural Resources

As previously discussed, although no subterranean parking is proposed, Alternative 5 would require excavation for building footings, basements, and infrastructure. Specifically, excavation under Alternative 5 would extend to a maximum depth of approximately 15 feet, as compared to approximately 45 feet of excavation under the Project, and involve approximately 154,000 cy of cut compared to approximately 772,000 cy under the Project. Therefore, like the Project, Alternative 5 has the potential to uncover previously unidentified tribal cultural resources, but to a lesser extent than the Project. As discussed in Section IV.L, Tribal Cultural Resources, of this Draft EIR, no tribal cultural resources have been previously recorded at the Project Site. Nonetheless, Alternative 5 would implement the City's standard Condition of Approval for the inadvertent discovery of tribal cultural resources, which would ensure that any impacts to tribal cultural resources would remain less than significant. Therefore, impacts under Alternative 5 related to tribal cultural resources would be less than significant, and such impacts

would be less than the less-than-significant impacts of the Project due to the reduction in excavation.

m. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities for Alternative 5 would result in a temporary water demand for dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. Construction-related water use under Alternative 5 would be reduced as compared to the Project, as this alternative would involve substantially less earthwork due to the elimination of subterranean parking. Furthermore, while Alternative 5 would require trenching for connection to the existing water mains in the adjacent streets similar to the Project, Alternative 5 would similarly implement a Construction Traffic Management Plan to ensure the safe and efficient flow of pedestrian and vehicular traffic around the Project Site during construction. As such, as with the Project, Alternative 5 would not result in construction activities that require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental impacts. Therefore, impacts under Alternative 5 related to water supply and infrastructure during construction would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project.

(b) Operation

As with the Project, Alternative 5 would result in an increase in long-term water demand. Because this alternative would include the same proposed development program as the Project, the increase in long-term water demand would be the same. Thus, as with the Project, the estimated water demand under Alternative 5 could be met by LADWP's projected water supplies, including in normal, single-dry, and multi-dry years through 2045. In addition, the existing water distribution infrastructure would be adequate to serve Alternative 5 since the water demand would be the same as under the Project. Furthermore, similar to the Project, Alternative 5 would implement all necessary on-site infrastructure and connections to the LADWP water system pursuant to applicable City requirements. Therefore, impacts under Alternative 5 related to water supply and infrastructure during operation would be less than significant, and such impacts would be the same as the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Limited wastewater generation may occur incrementally throughout construction of Alternative 5. However, such flows would be temporary and could be accommodated by the existing infrastructure since the Project's flows could be accommodated. In addition, construction workers would typically utilize portable restrooms, which would not contribute directly to the wastewater system that serves the Project Site but would eventually be treated at the HWRP, which has ample available capacity. As with the Project, new sewer line connections would be required to connect the proposed buildings to the main sewer infrastructure system in the streets surrounding the Project Site. Construction impacts associated with new connections would primarily be confined to trenching for the placement of pipe and connection into the existing main sewer lines, and any off-site work that could potentially affect existing sewer service to adjacent properties would be coordinated with the BOE. As such, Alternative 5, like the Project, would not require or result in the relocation or construction of new or expanded wastewater facilities, the construction or relocation of which could cause significant environmental effects during the construction period. Therefore, similar to the Project, impacts under Alternative 5 related to wastewater during construction would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 5 would increase wastewater flows from the Project Site. Because this alternative would include the same proposed development program as the Project, wastewater flows would be the same. As provided in Section IV.M.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the wastewater generated during Project operation could be accommodated by the existing remaining capacity of the HWRP. As operational wastewater generation under Alternative 5 would be the same as for the Project, the HWRP would have adequate capacity to serve Alternative 5.

Regarding wastewater conveyance (sewer) capacity, as discussed in Section IV.M.2, Utilities and Service Systems—Wastewater, of this Draft EIR, sewer service for the Project would be provided utilizing new or existing on-site sewer connections to the existing off-site sewer lines in the adjacent streets. According to the Utility Report prepared for the Project, the sewer lines serving the Project Site have adequate capacity to serve the Project. Since Alternative 5 would generate the same operational wastewater flows as the Project, the local sewer lines would have adequate capacity to serve Alternative 5. Also, as with the Project, detailed gauging and evaluation would be conducted for Alternative 5, as required by LAMC Section 64.14, to obtain final approval of a sewer capacity and connection permit during the permitting process. Furthermore, as with the Project, all

sanitary sewer connections and on-site infrastructure under Alternative 5 would be designed and constructed in accordance with applicable regulatory standards.

Based on the above, operation of Alternative 5, as with the Project, would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. Therefore, impacts under Alternative 5 related to wastewater during operation would be less than significant, and such impacts would be the same as the less-than-significant impacts of the Project.

(3) Electric Power, Natural Gas, and Telecommunications Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 5 would consume minor quantities of electricity (construction activities do not typically involve the consumption of natural gas or use of hard-wired telecommunications facilities). The energy consumed during construction of Alternative 5 would be less than under the Project due to the 78 percent reduction in soil import/export. Furthermore, because the Project Site is an urban infill site that is already served by energy infrastructure, like the Project, it is anticipated that Alternative 5 would not require the construction of off-site energy infrastructure improvements. Lastly, like the Project, Alternative 5 would be required to coordinate energy infrastructure improvements with LADWP and SoCalGas and develop on-site energy infrastructure and connections to the existing off-site energy infrastructure in accordance with applicable regulatory requirements. Hence, like the Project, construction activities under Alternative 5 would not result in an increase in energy demand that exceeds available distribution infrastructure capabilities that would require the construction of new or expanded energy facilities, the construction of which could cause significant environmental effects. Therefore, impacts on energy and telecommunications infrastructure associated with short-term construction activities under Alternative 5 would be less than significant and less than the less-than-significant impacts of the Project due to the overall reduction in construction activities (i.e., earthwork).

(b) Operation

As with the Project, operation of Alternative 5 would increase the demand for electricity, natural gas, and telecommunications relative to existing conditions. Even though Alternative 5 would result in the same overall building square footage as the Project, this alternative would result in slightly less energy demand associated with mechanical ventilation, which would not be required for the above-ground parking structures. All other operations would generate the same energy demands as the Project. Notwithstanding, Alternative 5 would result in similar operational impacts on energy

infrastructure and telecommunications when compared to the Project. Also, as discussed in the Utility Report, LADWP and SoCalGas have confirmed that the existing energy infrastructure in the area is sufficient to serve the Project. Because Alternative 5 would result in less operational energy demand than the Project, the existing energy infrastructure in the area would also be adequate to serve Alternative 5. Similarly, private telecommunications providers would be expected to expand service capacities as needed to meet demand. Therefore, as with the Project, Alternative 5 operation would not result in an increase in energy or telecommunications demand that exceeds available distribution infrastructure capabilities that would require the construction of new or expanded facilities, the construction of which could cause significant environmental effects. Impacts on energy and telecommunications infrastructure under Alternative 5 would be less than significant and similar to the less-than-significant impacts of the Project.

3. Comparison of Impacts

Alternative 5 would reduce the Project-level and cumulative significant and unavoidable construction-related regional air quality NO_X impacts to a less-than-significant level with mitigation by eliminating subterranean parking in order to reduce excavation and the export of soil. However, Alternative 5 would not avoid the Project's significant and unavoidable impacts with respect to regional NO_X and VOC emissions associated with concurrent construction and operations; Project-level and cumulative on- and off-site noise during construction; or Project-level on-site vibration and Project-level and cumulative off-site vibration (based on the significance threshold for human annoyance) during construction. These impacts would continue to be significant and unavoidable and would be similar to the Project's, with the exception of (a) the air quality impact related to concurrent construction and operations, which would be less than under the Project due to the reduction in earthwork; and (b) off-site construction noise, which would only occur during nighttime hours over the course of five days and, thus, would be substantially reduced in comparison to the Project. The duration of the regional NO_X and VOC emissions impacts associated with concurrent construction and operations and the significant noise and vibration impacts would be reduced due to the reduction in grading and the overall length of the construction schedule.

Alternative 5 would result in similar less-than-significant-with-mitigation impacts as the Project with regard to geologic hazards. Alternative 5 would also reduce several of the construction-related less-than-significant-with-mitigation impacts associated with the Project, including localized emissions during construction; archaeological resources; paleontological resources; and hazards and hazardous materials during construction.

Alternative 5 would result in similar less-than-significant impacts as the Project with regard to regional operational emissions; localized emissions during operation; TACs during operation; historical resources; energy efficiency; GHG emissions during operation;

hazards and hazardous materials during operation; surface water hydrology; surface water quality during operation; groundwater hydrology during operation; groundwater quality during operation; land use and planning; noise during operation; vibration (based on the significance threshold for building damage) during construction; vibration during operation; fire protection; police protection; transportation (including policy consistency, VMT impacts, and freeway safety); water supply and infrastructure during operation; wastewater; and energy and telecommunications infrastructure during operation.

Alternative 5 would reduce several of the construction-related less-than-significant impacts associated with the Project, including localized emissions during construction; TACs during construction; archaeological resources; paleontological resources; GHG emissions during construction; hazards and hazardous materials during construction; surface water quality during construction; groundwater hydrology and quality during construction; tribal cultural resources; water supply and infrastructure during construction; and energy and telecommunications infrastructure during construction.

4. Relationship of the Alternative to Project Objectives

Alternative 5, the Above-Ground Parking Alternative, would include the same proposed development program and layout as the Project except for the above-ground parking configuration. In addition, the maximum building heights and associated maximum height limits of Height Zone B along The Grove Drive and Height Zone C along Fairfax Avenue and Beverly Boulevard would be increased. Alternative 5 would involve the same amount of demolition (495,860 square feet), retention of existing uses (247,820 square feet), and new construction (1,626,180 square feet) as the Project, resulting in the same FAR of 1.75:1. Alternative 5 would also include the same Mobility Hub and the same frontage areas, building stepbacks, landscape plan, and streetscape improvements as the Project.

The mix of land uses and associated floor area provided under Alternative 5 would be the same as the Project, and, therefore, Alternative 5 would still generally meet the underlying purpose of the Project, which is to maintain Television City as a studio use and to modernize and enhance production facilities within the Project Site to meet both the existing unmet and anticipated future demands of the entertainment industry, keep production activities and jobs in Los Angeles, upgrade utility and technology infrastructure, and create a cohesive studio lot. However, Alternative 5 would be less effective than the Project in meeting this purpose since the elimination of subterranean parking would compromise the Project's internal circulation plan and create operational inefficiencies. The Project's parking, basecamp, loading, and circulation areas that are at-grade and subterranean would allow for stages to be serviced and supported more efficiently. By

eliminating these areas and elevating stages on parking podiums, maneuvering sets and equipment around the studio lot would become more challenging and inefficient. Further, the disruption of a single, contiguous production plane would create difficult circulation paths for production vehicles, as well as loading and engineering challenges. Lastly, Alternative 5 would result in sub-optimal production operations that would jeopardize the economic viability of these stages.

Regarding the Project objectives, Alternative 5 would meet the following Project objectives generally as effectively as the Project:

- Rehabilitate and preserve the integrity of the Primary Studio Complex consistent with the HCM designation and restore the currently obstructed public views of the HCM consistent with the HCM designation, while building upon Pereira & Luckman's master plan for a flexible and expandable studio campus.

- Promote local and regional economic growth by creating a wide range of entertainment jobs as well as construction jobs and keeping production jobs in Los Angeles.

- Contribute to Los Angeles' status as a global creative capital and provide maximum opportunity for productions to be filmed in the region through the continued use and expansion of the Project Site as a major studio and entertainment institution, in conformance with the goals and objectives of applicable local and regional plans and policies.

- Provide multi-modal transportation solutions, including a Project Mobility Hub, to connect TVC employees and guests with surrounding public transit lines, employee shuttles, and a rideshare program, to encourage alternative means of transportation, and focus growth in a high-density, jobs-rich area in close proximity to transit.

- Create a model for environmental sustainability in modern production studio operations by implementing best management practices regarding water, energy, and resource conservation.

Alternative 5 would partially meet the following Project objectives or would not meet the objectives as well as the Project:

- Create a fully integrated and cohesive master planned site regulated by a Specific Plan that retains the Project Site's land use as a studio facility and provides an expandable, flexible, and operationally seamless production ecosystem that is able to respond to evolving market demands, support content creation, and maximize studio production capabilities.

- Optimize the currently underutilized Project Site to address past ad hoc building additions and meet the existing unmet and anticipated future demands of the entertainment industry by providing new technologically advanced sound stages combined with an adequate and complementary mix of state-of-the-art production support facilities and production offices.

- Complement the neighboring community through design elements that would be compatible with surrounding uses, concentrate building mass and height towards the center of the Project Site, and provide an enhanced public realm to promote walkability, foster connectivity and safety, and better integrate on- and off-site uses.

- Provide adequate, safe, and efficient ingress/egress, circulation, staging, and parking that satisfies the unique demands of a large-scale production studio with direct, enhanced access to the uses on-site and sufficient truck and trailer circulation areas, in compliance with modern fire and life safety requirements.

- Create multiple production basecamps to allow for the flexible and efficient staging of vehicles needed for film and television productions.

- Enhance the identity of the Project Site as an iconic entertainment and media center by providing architecturally distinct development and a creative signage program that reflects and complements the production uses on-site.

- Permit a reasonable, risk-adjusted return on investment commensurate with the Project Applicant's fiduciary responsibilities and allow for sustained economic viability and growth in an evolving entertainment market, while generating tax and property revenues to the City.

V. Alternatives

F. Environmentally Superior Alternative

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

With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible alternatives includes Alternative 1, No Project/No Build Alternative; Alternative 2, Development in Accordance with Existing Zoning Alternative; Alternative 3, Reduced Density Alternative; Alternative 4, Mixed-Use Alternative; and Alternative 5, Above-Ground Parking Alternative. Table V-2 on page V-16 provides a comparative summary of the environmental impacts anticipated under each alternative with the environmental impacts associated with the Project. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the Project.

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project/No Build Alternative, would avoid all of the Project's significant environmental impacts.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that Alternative 5, the Above-Ground Parking Alternative, would be the Environmentally Superior Alternative. As discussed above, although Alternative 5 would not eliminate all of the Project's significant and unavoidable impacts, Alternative 5 would reduce the Project-level and cumulative construction-related regional air quality impacts related to NO_X emissions from a significant and unavoidable level to a less-than-significant level with mitigation by eliminating subterranean parking that reduces excavation and the export of soil. Alternative 5 would also reduce the Project-level and cumulative air quality impacts related to concurrent construction and operations and would substantially reduce the Project's off-site construction noise impact, although these impacts would remain significant and unavoidable. Alternative 5 would result in the same significant and unavoidable impacts related to on-site noise during construction and on- and off-site vibration during construction (based on the significance threshold for human

annoyance). In addition, Alternative 5 would result in the same significant cumulative impacts that cannot feasibly be mitigated with regard to on-site construction noise and off-site construction vibration (based on the significance threshold for human annoyance). The duration of the regional NO_X and VOC emissions impacts associated with concurrent construction and operations and the significant noise and vibration impacts would be reduced due to the reduction in grading and the overall length of the construction schedule.

Of the Project's less-than-significant-with-mitigation impacts, Alternative 5 would result in similar less-than-significant-with-mitigation impacts as the Project with regard to geologic hazards. Alternative 5 would also reduce several of the construction-related less-than-significant-with-mitigation impacts associated with the Project, including localized emissions during construction; archaeological resources; paleontological resources; and hazards and hazardous materials during construction. Of the Project's less-than-significant impacts, those related to construction activities or occurring during construction would generally be less than the Project's impacts due to the reduction in soil import/export, while those related to operational activities would be the same as under the Project. Under Alternative 5, no environmental impacts would be greater than the Project. Thus, of the range of alternatives analyzed, Alternative 5, the Above-Ground Parking Alternative, would be the Environmentally Superior Alternative.

However, as previously discussed, Alternative 5 would not meet the underlying purpose of the Project as effectively as the Project since the elimination of subterranean parking would compromise and require changes to the Project's internal circulation plan, resulting in reduced integration of the production staging, loading, and basecamp areas with sound stages and filming areas, thereby making studio operations less efficient and flexible. These sub-optimal production operations would jeopardize the economic viability of the sound stages. Additionally, Alternative 5 would only partially meet the following Project objectives or would not meet the objectives as well as the Project, generally due to the elimination of the Project's subterranean parking and resulting effects on internal circulation and production efficiencies, as well as the increased building massing:

- Create a fully integrated and cohesive master planned site regulated by a Specific Plan that retains the Project Site's land use as a studio facility and provides an expandable, flexible, and operationally seamless production ecosystem that is able to respond to evolving market demands, support content creation, and maximize studio production capabilities.

- Optimize the currently underutilized Project Site to address past ad hoc building additions and meet the existing unmet and anticipated future demands of the entertainment industry by providing new technologically advanced sound stages combined with an adequate and complementary mix of state-of-the-art production support facilities and production offices.

- Complement the neighboring community through design elements that would be compatible with surrounding uses, concentrate building mass and height towards the center of the Project Site, and provide an enhanced public realm to promote walkability, foster connectivity and safety, and better integrate on- and off-site uses.

- Provide adequate, safe, and efficient ingress/egress, circulation, staging, and parking that satisfies the unique demands of a large-scale production studio with direct, enhanced access to the uses on-site and sufficient truck and trailer circulation areas, in compliance with modern fire and life safety requirements. Create multiple production basecamps to allow for the flexible and efficient staging of vehicles needed for film and television productions.

- Enhance the identity of the Project Site as an iconic entertainment and media center by providing architecturally distinct development and a creative signage program that reflects and complements the production uses on-site

- Permit a reasonable, risk-adjusted return on investment commensurate with the Project Applicant's fiduciary responsibilities and allow for sustained economic viability and growth in an evolving entertainment market, while generating tax and property revenues to the City.